

**ENVIRONMENTAL COMPLIANCE  
ASSESSMENT OF  
TULLY LAKE  
ROYALSTON, MASSACHUSETTS**

**PRELIMINARY FINDINGS REPORT  
U.S.Army Corps of Engineers  
New England Division**

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The environmental compliance assessment of Tully Lake in Royalston, Massachusetts was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The findings at Tully Lake are as follows: There were one Major Deficiencies (Problems that require action and pose a threat to human health, safety or to the environment); twenty-five Minor Deficiencies (Deficiencies that are mostly administrative in nature which requires monitoring or planning for future mitigation); and thirteen Management Practices (Items noted are not specifically covered by laws or regulations; however, they still require management attention). Overall, the project was well maintained as demonstrated by the lack of serious environmental deficiencies.				
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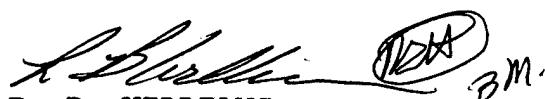
6 October 1992

MEMORANDUM THRU Chief, Project Operations and Readiness Division  
FOR Director of Operations

SUBJECT: Environmental Compliance Assessment of Tully Lake

1. Attached please find the Environmental Compliance Assessment of Tully Lake, utilizing the Environmental Review Guide for Operations (ERGO).
2. This compliance assessment was prepared by the NED ERGO Team, Bruce Williams (NED-OD-P), Jim Law (NED-OD-P), Mike Penko (NED-PL-IA), Townsend Barker (NED-ED-WQ), Jim Peck (NED-SO), and Anne Laster (NED-RE).
3. Upon approval of the assessment, the Project Manager, Tully Lake, will develop an action plan to prioritize and correct findings identified in the ERGO assessment. In order that resources are programmed and dedicated to correct these problems, recommend that remediation which can be performed as routine maintenance work be completed within the next 3 years, other work should be programmed in the budget process for completion within 5 years.
4. I recommend your approval for implementation.

Atch

  
R. B. WILLIAMS  
ERGO Program Manager

CMT 2

Environmental Compliance Assessment of Tully Lake  
is approved X disapproved \_\_\_\_\_ for implementation as stated.

  
J. C. WONG  
Director of Operations

**ENVIRONMENTAL COMPLIANCE  
ASSESSMENT OF  
TULLY LAKE  
ROYALSTON, MASSACHUSETTS**

**PRELIMINARY FINDINGS REPORT  
U.S.Army Corps of Engineers  
New England Division**

For Inter Corps Office Distribution Only

## EXECUTIVE SUMMARY

An environmental compliance assessment of Tully Lake in Royalston and Athol, Massachusetts was conducted by an interdisciplinary team of New England Division environmental professionals from 4-8 May 1992.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, state, local, Department of Defense (DoD), and U.S. Army laws and regulations.

An overall ERGO compliance assessment considers 12 major environmental compliance categories. Each category, Federal, state and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained as demonstrated by the lack of serious environmental deficiencies. The findings at Tully Lake are as follows:

### **Significant Deficiencies - None**

Problems that pose a direct & immediate threat to human health, safety or to the environment.

### **Major Deficiencies - One (1)**

Problems that require action and pose a threat to human health, safety or to the environment.

### **Minor Deficiencies - 25**

Deficiencies that are mostly administrative in nature. These problems require monitoring or planning for future mitigation.

### **Management Practices - 13**

Items noted are not specifically covered by laws or regulations; however, they still require management attention.

\* Note A special thanks to Steve Andon of NED Emergency Operations Center for assigning LTC Douglas Outlaw to the ERGO program during LTC Outlaw's two week tour of duty from 27 April to 8 May 1992. LTC Outlaw's professional performance and specific knowledge of federal environmental compliance regulations was very beneficial to the successful completion of the Tully Lake compliance assessment.

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## THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

- 1) Enhance Corps of Engineers environmental compliance at federal, state, and local levels.
- 2) Improve Corps of Engineers environmental management.
- 3) Build supporting financial programs and budgets.
- 4) Assure supervisors their environmental programs are being implemented effectively in accordance with Corps of Engineer goals and objectives.

Periodic internal environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and to provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

The Corps of Engineers ERGO program began with the creation of a steering committee. Arrangements were made with the U.S Army Construction Engineering Research Laboratory (USACERL) to compile all relevant federal, Department of Defense, Army, Corps of Engineer and state and local laws and regulations to produce the draft manual.

The ERGO manual of environmental compliance assessments was pilot tested at various facilities in the Nashville District in May 1990. The program was field tested at several projects during FY 1991 and the manual was distributed as a final draft.

In January 1991, the Chief, Operations, Construction and Readiness Division (USACE), directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). Because it is responsible for the majority of USACE facilities, Operations Directorate was tasked with the development and maintenance of the ERGO program.

New England Division's ERGO program became operational in August 1991. An ERGO review team was established by the ECC in October 1991. The ERGO program manager scheduled 8 projects, including Tully Lake, for completion of environmental compliance evaluations in FY-92.

## EVALUATION PROCEDURES

The ERGO evaluation of Tully Lake was conducted by a 6 person team comprised of NED personnel. The team followed a three phase approach. The first phase was to obtain pre-assessment information (see Appendix A) from the site concerning on-site activities and review applicable state or local environmental regulations.

The second phase involved the on-site portion of the assessment. This involved a briefing of project, district and/or regional management and staff, followed by a facility tour to obtain a general overview of facility operations. Typically, the team member would interview project staff responsible for a particular functional area, visually inspect the project/facility, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project manager and staff to apprise them of the review team's findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of Tully Lake followed the above procedures and covered the elements set forth in the 12 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment consisted of reported and sample observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered, and therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of Tully Lake was reliant on complete foreclosure of all information regarding the operation and maintenance activities at the project.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

## ERGO MANUAL OBJECTIVES

The Environmental Review Guide for Operations (ERGO) manual is intended to serve as the primary tool for conducting environmental compliance evaluations at Corps of Engineer projects and facilities. The objectives of the program are to:

- 1) Compile applicable Federal laws and regulations associated with Corps of Engineers operations and activities.
- 2) Synthesize environmental regulations, good management practices, and risk management issues into consistent and easy to use checklists.
- 3) Serve as a reference document for daily operations.
- 4) Serve as a standard for evaluation of environmental compliance.

## DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, federal regulations, and state regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will include the following information:

### SIGNIFICANT DEFICIENCY (SIG.):

A problem categorized as significant requires immediate attention. It poses, or has high likelihood of posing, a direct and immediate threat to human health, safety, the environment, or the installation mission.

### MAJOR DEFICIENCY (MAJ.):

A problem categorized as major requires action, but not necessarily immediate attention. It has the potential to result in a notice of violation from regulatory agencies. A major deficiency may pose a threat to human health, safety or the environment.

### MINOR DEFICIENCY (MIN.):

A minor deficiency is mostly administrative in nature, even though it might result in a notice of violation. It may also be a temporary or occasional instance of noncompliance.

### MANAGEMENT PRACTICE (MGT.):

A management practice is not considered a deficiency because it is not based on a specific regulatory requirement. Although items noted may not be specifically covered by regulation, and are not assigned severity ratings, they still require management attention.

REGULATORY COMPLIANCE TABLE  
for  
TULLY LAKE

COMPLIANCE CATEGORY

FINDINGS

	SIG.	MAJ.	MIN.	MGT.
Air Emissions			1	1
Cultural and Historic Resources Management			1	
Hazardous Material Management	1	5	3	
Hazardous Waste Management			1	3
Natural Resources Management			7	1
Pesticide Management			1	
Petroleum Oil and Lubricant (POL) Management				2
Solid Waste Management			5	1
Special Pollutants Management (Radon,Asbestos,PCB's,Noise)			2	2
Underground Storage Tanks (UST) Management				
Wastewater Management				
Water Quality Management			2	
Totals	0	1	25	13

## AIR EMISSIONS MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Corps owned vehicles have not been inspected for air pollutant emissions.

CRITERIA: State of Massachusetts regulations (310 CMR 7.20) require yearly testing of motor vehicles for hydrocarbons and carbon monoxide emissions. Section 118 of the federal Clean Air Act and ER 56-2-1 requires full federal compliance with state and local air quality regulations.

EFFECT: Unlawful levels of air pollutants may be released from project vehicles.

SOLUTION: Corps vehicles should be inspected yearly for emissions and necessary measures taken to correct any deficiencies.

FINDING: Management Practice

CONDITION: It is unknown if air conditioners in Corps owned vehicles are serviced at facilities which properly recycle refrigerant containing chlorofluorocarbons.

CRITERIA: The 1990 Clean Air Act requires all persons servicing motor vehicle air conditioners to properly use approved CFC recycling equipment by 1 January 1993.

EFFECT: CFC's could be released from Corps owned vehicles during servicing. CFC's contribute to atmospheric ozone depletion and such releases should be avoided.

SOLUTION: Project Manager should assure that air conditioners in Corps vehicles are serviced at only facilities which properly recycle CFC's.

CULTURAL AND HISTORIC RESOURCES MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Project lacks an adequate cultural resources inventory. The existing inventory does not adequately survey the project for prehistoric sites or properly assess the significance of known sites.

CRITERIA: Corps facilities are required to locate, inventory, and nominate all properties that appear to qualify for listing on the National Register of Historic Places (16 USC 470, 36 CFR 800, ER 1130-2-438).

EFFECT: 1) Project is not in compliance with Section 106 of the National Historic Preservation Act.  
2) Cultural resources may be at risk.

SOLUTION: Program funding to upgrade the existing cultural resources inventory and update the Historic Properties Management Plan.

HAZARDOUS MATERIAL MANAGEMENT

FINDING: Management Practice

CONDITION: Relevant regulations, directives and guidance documents on hazardous materials are not maintained at the project.

CRITERIA: The following documents shall be maintained and kept current at the dam:

29 CFR 1910, Occupational Safety and Health Standards  
40 CFR 302, Reportable Quantities of Hazardous Materials (Table 302.4)  
49 CFR 172, 173, 178 and 179, Research and Special Programs Administration.  
NFPA, Fire Protection Guide of Hazardous Materials.  
ER 500-1-1, Natural Disaster Procedures Ch.1.  
EM 385-1-1, Safety and Health Requirements Manual.

SOLUTION: 1) Project Operations will obtain copies of relevant regulations and distribute to Tully Lake.  
2) Project Manager will assure that regulations are reviewed periodically and kept current.

COMMENT: With incomplete or outdated regulatory file, project personnel may be unaware of proper hazardous materials management practices which may result in regulatory violations an/or environmental harm.

FINDING: Minor Deficiency

CONDITION: Facility does not have a written Oil and Hazardous Substance Contingency Plan for spill events.

CRITERIA: The Contingency Plans should contain the following: Hazardous Substance Storage area, Designated individual to initiate spill response, periodic drills, schedule emergency equipment list, emergency medical procedures, key phone numbers, decontamination procedures. (ER 1130-2-434)

EFFECT: Lack of or unfamiliarity with plan can result in inappropriate or delayed emergency response exacerbating damage or injury.

SOLUTION: Emergency Operations Center is developing Oil and Hazardous Substance contingency Plan for spill events. Plan will be distributed to Tully Lake when complete.

COMMENT: Draft information on spill contingency plans was prepared and submitted to Project Operations in January 1988.

FINDING: Management Practice

CONDITION: 1) Facility has not coordinated with local fire department concerning types of hazardous chemicals used at the facility, the areas where they are used, what they are used for, and quantities in a given operation.  
2) Coordination with local fire department was accomplished for underground storage tanks in 1988 and again in 1991.

CRITERIA: Review coordination efforts with local fire department determine whether the department is aware of areas that are at high risk for chemical incidents.

EFFECT: Chemicals reacting to heat or flame could pose a serious threat to fire fighting personnel aware of their presence or location.

SOLUTION: Facility staff should initiate coordination efforts with the fire department.

FINDING: Minor Deficiency

CONDITION: Facility does not have a MSDS for each hazardous chemical stored and used at the facility.

CRITERIA: MSDS must be on file and readily accessible to workers for each hazardous material stored or used. (40 CFR 1910.1200(g)(1) 910.1200(g)(8))

EFFECT: In the absence of MSDS project personnel may be unaware of hazards associated with certain chemicals or unable to take appropriate emergency action.

SOLUTION: Division office is in process of reviewing chemical list provided by the facility. MSDS sheets will be obtained for all hazardous chemicals listed.

FINDING: Minor Deficiency

CONDITION: Inside flammable/ combustible storage room does not meet certain specifications. (Photo 1 & 2)

CRITERIA: Storage facilities should meet the following criteria:  
1) Fire resistant walls, sill or ramp separating adjacent rooms  
2) Liquid tight floor/wall joints  
3) Self closing fire doors  
4) NEPA approved electrical wiring  
5) Suitable capacity exhaust system  
6) Clear isles. (29 CFR 1910.106 (d)(4))

EFFECT: Without sill spills could migrate to basement drain and subsequently into the soil. Poor ventilation in the paint room creates an unhealthful environment.

SOLUTION: Provide adequate ventilation system and construct sill at doorway to confine spills.

FINDING: Minor Deficiency

CONDITION: Hazardous materials were found stored in many locations. While storage areas are designated as storage areas at Tully Lake, these other areas have not all been documented as legitimate storage areas. (Photo 3,4,5,6,7,8 & 22)

CRITERIA: A master listing of all hazardous materials storage sites should be maintained at the facility and at the Division Office.

SOLUTION: 1) Move all materials to designated storage area and set up a policy listing that all materials will be stored in them.  
2) Reduce the amount of materials stored so that they can all fit into existing storage.

FINDING: Management Practice

CONDITION: A periodic drill or contingency demonstration has not been conducted as part of the emergency response spill plan.

CRITERIA: Facilities must have a written Oil and Hazardous Material Substance Contingency Plan for spill events.

SOLUTION: Set up a mock situation and run through a drill or demonstration.

FINDING: Minor Deficiency

CONDITION: Fire extinguisher and signs are not properly provided.  
29 CFR 1910.106 (d)(7)

CRITERIA: Areas where flammable/combustibles are stored (both inside the utility building in the paint locker and at the storage building) must meet certain fire protection standards.

SOLUTION: Locate a 12B rated fire extinguisher outside door openings not to exceed 10 ft away. Place "No open flame spark within 50 ft" sign.

FINDING: Major Deficiency

CONDITION: Materials were found leaking in the storage area.  
Housekeeping of hazardous material storage containers was poor.  
29 CFR 1910.(e)(z), DoD 4145.19-R-1 (Photo 10,11,12,13 & 14)

CRITERIA: Incidental storage of flammable/combustible liquids in industrial areas must conform to certain requirements and certain storage and handling criteria are to be observed.

SOLUTION: Review and improve material handling and storage procedures and follow good housekeeping standards.

## HAZARDOUS WASTE MANAGEMENT

FINDING: Management Practice

CONDITION: Project lacks a contingency plan for responding to discovery of potential HTW contaminated sites.

CRITERIA: A contingency plan outlining steps to follow upon discovery of potential HTW contaminated sites should be in place.

EFFECT: If proper steps are not taken to investigate potential HTW sites, project personnel or the public could be unnecessarily exposed to hazardous/toxic wastes.

SOLUTION: A contingency plan for investigating potential HTW contaminated sites should be developed. Project manager should have training necessary to implement the plan (i.e. the EPA 40 hour Hazardous Materials Incident Response course taught in accordance with 29 CFR 1910.120).

FINDING: Potential Minor Deficiency

CONDITION: A 55 gallon drum present in a materials storage area near the dam spillway appears to be full or partially full. Contents are unknown, but may be rainfall that has leaked into the drum over time (project manager believes that all drums were empty when brought to site). The drum is labeled as containing freon. (Photo 7,19, also Photo's 18,20, & 21)

CRITERIA: Hazardous wastes should be properly stored, handled, and disposed of (40 CFR 262, 310 CMR 30).

EFFECT: The drum may contain hazardous substances and pose a risk to the environment and human health.

SOLUTION: Contents of the drum should be tested and properly disposed of.

FINDING: Management Practice

CONDITION: Not all hazardous waste containers were properly labeled or stored in designated area. (Photo 3,4, 5,6,7, & 8)

CRITERIA: Separate covered nonflammable/nonreactive labeled containers shall be provided for the collection of garbage, oils, flammable and hazardous wastes. Containers shall be stored in appropriate, designated storage areas. (EM 385-1-1;11.V.07)

EFFECT: Non-labeled wastes can not easily be identified, especially after staff turnover. This may lead to incorrect storage and handling practices and may require costly testing prior to disposal. Wastes not stored in designated area are more prone to accidental spillage and introduction to the environment. Waste inventory determination becomes more difficult.

SOLUTION: All hazardous wastes containers shall be properly labeled and stored.

FINDING: Management Practice

CONDITION: In the past, the hazardous waste storage building was being utilized as a collection and storage point for hazardous waste products imported from other projects/facilities. Tully Lake is not properly permitted as a collection and storage facility for hazardous waste products. (Photo 10)

CRITERIA: 1) Facilities are required to abide by state and local regulations. ER 200-2-2 para. 20  
2) Tully Lake's EPA Very Small Quantity Generator license ID #MA2960009817 (20 July 1987) does not authorize the importation of hazardous wastes from other projects/facilities.

SOLUTION: In the future, operate the facility in accordance with the EPA license conditions

COMMENTS: Tully Lake is no longer being used as a collection point for hazardous waste from other LCRB and NED Projects.

NATURAL RESOURCES MANAGEMENT

FINDING: Minor Deficiency

CONDITION 1: Master Plan for Tully Lake is dated and approved September 1976. Plan is outdated and does not reflect current development of natural or man-made resources at this project.

CRITERIA: ER 1130-2-435 section (10)(a) requires scheduling of revision of master plans within 5 years of date of the regulation, 30 December 1987.

EFFECT: Operational Management Plans (OMP's) developed in accordance with and for the purpose of implementing the outdated Master Plan will be equally outdated.

SOLUTION: Program resources to update Master Plan within next 5 years.

CONDITION 2: The Fish and Wildlife Management Plan is outdated and does not emphasize the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

CRITERIA: Fish and wildlife plans must address the management of all indigenous species and be based upon the following:  
- inventory of fish and game species  
- inventory of endangered, threatened and other special interest plant or animal species  
- survey of non-game wildlife other than endangered species  
  
Verify that fishing, hunting and trapping are authorized and controlled in conformance with Federal and state laws, local regulations and approved management plans (ER 1105-2-50, para. 2-1).

SOLUTION: Update the current Fish and Wildlife Management plan to include and emphasize items mentioned above.

CONDITION 3: The Forest Management Plan is outdated and does not adequately address the provisions for sustained production of timber and/or be compatible with multiple use resource management objectives.

CRITERIA: The Forest Management Plan must be current and include the following: (ER 1130-20400 para. 11(1)).

- volume inventories and conducted and kept current
- small volume (including firewood) sales are in accordance with regulations
- harvesting and treatment
- sustain yield
- improve vegetation conditions
- control pests
- improve watersheds
- improve wildlife habitat
- complement natural beauty values

SOLUTION: The Forest Plan needs to be revised and updated to include provisions to address the resource management objectives listed above.

FINDING: Minor Deficiency

CONDITION: Project OMP (Operational Management Plan) has not been developed in coordination with the planning, real estate and safety element of the project.

CRITERIA: All Corps facilities are required to develop and maintain a project operational management plan (OMP). (ER 1130-2-400 para.6 and para.9 through 11 Appendix B.)

SOLUTION:

- 1) Develop an OMP in accordance with ER 1130-2-400 and assure that it addresses all operational projects in the Master Plan (ER 1130-2-435).
- 2) Verify that the OMP has been approved by the Division Commander.
- 3) Verify that the OMP is updated as required and when funds are available.

FINDING: Minor Deficiency

CONDITION: Wetlands at the project have not been identified and protected.

CRITERIA: Wetlands should be identified and protected. All activities in the floodplains are to be conducted in accordance with state and federal regulations.

SOLUTION: Wetlands at Tully Lake should be delineated.

FINDING: Minor Deficiency

CONDITION: A field survey to determine if any Federally threatened or endangered species or state listed species of special concern occur in the project area is lacking. Without such a survey, the possibility that normal project operations may harm Federal or state listed species cannot be ruled out.

CRITERIA: The Federal Endangered Species Act (16 USC 1536) prohibits actions which jeopardize the continued existence of threatened or endangered species, or destroy or adversely affect critical habitat of such species. Similar protection is provided by the Connecticut Endangered Species Act (Public Act No. 89-224, Section 9).

SOLUTION: Program funds to conduct a survey of project area to determine if any rare threatened and endangered species are present at the project. If any are found, management plans to protect existing populations should be developed and implemented.

FINDING: Minor Deficiency

CONDITION: The existing Environmental Assessment/FONSI for operation and maintenance activities at Tully Lake was written in 1977 and does not accurately address current conditions at the project or project impacts.

CRITERIA: An up to date Environmental Assessment describing existing project conditions and impacts of project operation on natural and cultural resources should be available.

SOLUTION: Update Environmental Assessment/FONSI.

FINDING: Minor Deficiency

CONDITION: Erosion is occurring along portions of Tully Lake shoreline. No survey of shoreline erosion is available and no measures have been taken to control the erosion.

CRITERIA: Measures shall be provided to control erosion damage to land (ER 1130-2-400 and EM 1110-1-400).

SOLUTION: Survey reservoir shoreline for erosion, and develop and implement a shoreline erosion control plan. Strong consideration should be given to using innovative, low cost, biotechnical shoreline erosion control techniques such as those developed at WES. Planting emergent vegetation may be appropriate to control minor shoreline erosion occurring at the Tully Lake campground.

FINDING: Minor Deficiency

CONDITION: Tully Lake levels were held at a higher than normal levels for several months during the summer of 1985 as part of a drought contingency storage plan study. Numerous trees were killed as a result. An Environmental Assessment was not prepared prior to this action, and no coordination with state and federal resource agencies apparently took place. Potential impacts on threatened and endangered species were not considered (note: the dwarf cow lily, a state listed threatened species may occur in Long Pond and could have been adversely affected by this action).

CRITERIA: Corps of Engineers NEPA regulations (33 CFR 230) recommend preparation of an Environmental Assessment prior to changes in pool level operations. Fish and Wildlife Coordination Act requires consultation with federal and state resources agencies on all water resource projects.

SOLUTION: Future changes in reservoir operation for drought contingency storage or any other reason should not be made without completion of Environmental Assessment and coordination with state and federal resource agencies.

FINDING: Management Practice

CONDITION: Long Pond appears to provide good potential nesting habitat for wood ducks. Nesting boxes may of value.

CRITERIA: Measures should be taken to maintain and enhance fish and wildlife habitat at Corps projects (Fish and Wildlife Coordination Act; ER 1165-2-28).

SOLUTION: Evaluate the potential of the project area to support woods ducks and the need for nesting boxes.

COMMENT: Wood Duck boxes have been placed along the more remote areas of the Tully Lake shoreline.

## PESTICIDES MANAGEMENT

FINDING: Minor Deficiency

CONDITION: Project has not developed a Pest Management Program (PMP) and is not fully participating in the Division PMP.

CRITERIA:

- 1) Each Division will implement a Pest Management Program.  
(ER 1130-2-413, para. 6.a.(2))
- 2) The Division Commander must designate a trained single point of contact for management of the Division pest control program.
- 3) The Division Office must maintain a current listing of suspended, canceled and restricted use pesticides.

SOLUTION:

- 1) Designate a trained single point of contact for management of the PMP in the Natural Resource Management Branch.
- 2) POC should develop and keep current a list of suspended, canceled and restricted use pesticides.
- 3) POC will review and approve all Pest Management plans, contracts, purchase orders, etc.

## PETROLEUM OIL LUBRICANT (POL) MANAGEMENT

FINDING: Management Practice

CONDITION: The facility does not have access to a current file of applicable Federal, Corps, and state POL regulations.

CRITERIA: The following regulations should be maintained and kept current at the facility: 29 CFR 1910, 33 CFR 153, 40 CFR 110, 112, 40 CFR 266, EM 385-1-1, EP 415-1-261, ER 500-1-1, appropriate state and local regulations.

EFFECT: Lack of or incomplete regulatory files may result in poor POL Management practices.

SOLUTION: Copies of all relevant material will be distributed to the project.

FINDING: Management Practice

CONDITION: Facility has informal plan for recycling waste petroleum products, i.e., waste oil is brought to waste oil recovery facility.

CRITERIA: Management of Recoverable and Waste Liquid Petroleum Plan has been prepared and adopted by Division Engineer.

EFFECT: Formal management plan is needed to assure that all field staff are aware of good management practice.

SOLUTION: Although staff is treating recoverable waste products in accordance with GMP, no formal plan is available. Formal plan is being prepared by Division office and will be distributed to all field offices.

## SOLID WASTE MANAGEMENT

FINDING: Possible Minor Deficiency

CONDITION: Numerous car mufflers and other debris have been dumped in a gravel pit that is either on, or adjacent to, fee owned land. (Photo 33 & 34)

CRITERIA: Garbage, rubbish, litter, and other debris should not be brought onto the project for dumping or disposal without permission (40 CFR 327.9(b)). Massachusetts regulations prohibit open dumping (310 CMR 19.04).

EFFECT: Violation of state regulations. Poor aesthetics.

SOLUTION: Project Manager should determine if the mufflers and other debris are present on fee owned land. If so, the material should be removed and properly disposed of at a state licensed landfill. Increase surveillance of project lands for trash, litter and other improperly disposed of debris.

COMMENT: Tully Lake is awaiting Real Estate action to verify project boundaries including resurveying if necessary.

FINDING: Minor Deficiency

CONDITION: Three paint cans containing a viscous petroleum product were found on fee owned land near the old gravel pit adjacent to Route 68.

CRITERIA: Garbage, rubbish, litter, and other debris should not be brought onto the project for dumping or disposal without permission (40 CFR 327.9(b)). Massachusetts regulations prohibit open dumping (310 CMR 19.04).

EFFECT: Minor threat to water quality, public health. Violation of state law.

SOLUTION: Clean up site.

FINDING: Management Practice

CONDITION: An old car body is present along Tully River downstream of dam (Photograph 32).

CRITERIA: Miscellaneous debris on project lands should be removed and properly disposed of.

EFFECT: The old car body is unsightly. Rusted edges pose a safety hazard.

SOLUTION: Remove and properly dispose of the car body after consultation with NED archaeologist.

FINDING: Minor Deficiency

CONDITION: Trash receptacles used in the recreation area do not have covers or handles.

CRITERIA: Trash receptacles should have functioning lids (40 CFR 243.200-1(a) and EM 385-1-1). Those designed to be emptied manually should have handles.

EFFECT: Unsanitary conditions.

SOLUTION: Provide trash receptacles that have lids and otherwise conform to above criteria.

FINDING: Minor Deficiency

CONDITION: Numerous empty 55 gallon drums, steel cable, a ca. 250 gallon aboveground fuel tank (used by project as a water tank), used fence posts and guard rails, creosote treated lumber, and other items are stored haphazardly near the project spillway (see Photograph 17,18,19,20,21,25,28,29 & 30).

CRITERIA: Excess material should be stored in an orderly manner. Items not likely to be of future use should be recycled or properly disposed of. Use of creosote treated lumber should be avoided where possible. Unneeded creosote treated lumber should be disposed of properly at a state licensed landfill. Note: Massachusetts regulations (310 CMR 16) prohibit speculative accumulation of materials unless a reasonable future use for the material can be postulated.

EFFECT: Potential Safety hazard to public (tripping). Potential exposure of project personnel and public to creosote, a known carcinogen. Area is unsightly.

SOLUTION: The need for items stored at the site should be carefully assessed. Items not likely to be of use in the future (e.g. the empty 55 gallon drums) should be recycled or properly disposed of at a state licensed landfill.

FINDING: Minor Deficiency

CONDITION: Miscellaneous debris, including asphalt and concrete rubble, and woody debris are being dumped at an open dump near the spillway (Photograph 3).

CRITERIA: Open dumping of wastes is prohibited by Massachusetts state law (310 CMR 19.014).

EFFECT: Presence of unlicensed open dump violates state laws. Dump is unsightly.

SOLUTION: The open dump should be evaluated according to Massachusetts landfill site assessment criteria. Based on results of the evaluation, the dump should either be capped or removed from the site. Any material removed from the site should be properly disposed of at a state licensed landfill. It may be possible to obtain a local burning permit for woody debris. No additional material should be disposed of at the site unless permitted by the state.

SPECIAL POLLUTANTS - RADON

FINDING: Management Practice

CONDITION: The project has had a radon survey conducted. The Basin Office basement recorded over 4pCi/L in the survey. Continued, on-going, radon measurement is underway.

CRITERIA: Levels of greater than 4pCi/L found indoors is considered dangerous. Lengthy continued exposure is especially dangerous.

SOLUTION: 1) Continue monitoring process and limit individual's time in the Basin Office basement until the hazard is cleared.  
2) Less than 80 hours a year should be spent in the basement.

SPECIAL POLLUTANTS MANAGEMENT - PCB'S

FINDING: The facility has not had a PCB spill, does not use PCB's and does not have PCB transformers, PCB storage, disposal or landfill facilities, or PCB's of any kind.

SPECIAL POLLUTANTS - ASBESTOS

FINDING: Minor Deficiency

CONDITION: An asbestos survey of Corps facilities has not been conducted. Asbestos insulation on heating pipes in the basement of the Basin Office have been identified and properly labeled. Asbestos containing material (ACM) in the exhaust system of the stand-by generator in the gatehouse has been properly sampled by the NED Environmental Lab and removed by a licensed contractor.

CRITERIA: All corps facilities are required to conduct an asbestos survey of all their facilities. (ER 200-2-2)

SOLUTION: Have an asbestos survey conducted at all Tully Lake facilities. Where asbestos containing material (ACM) is suspected, limited personal activity should take place until results of survey is completed.

COMMENT: Positive steps have been taken to remove or mitigate effects of ACM when located at Tully Lake. An asbestos survey will assure that all ACM has been located. (Photo 15)

SPECIAL POLLUTANTS - NOISE

FINDING: Management Practice

CONDITION: A log is not maintained to log complaints on noise produced by Corps of Engineer activities and Operations.

CRITERIA: A single point of contact be identified to address noise complaint. This POC shall keep a written log of complaints on noises produced by Corps of Engineer activities and operations.

SOLUTION: Establish a Noise Complaint log and identify a POC.

FINDING: Minor Deficiency

CONDITION: A noise survey has not been conducted to identify potential noise hazards and to determine adequate personnel protection. (Photo 16)

CRITERIA: Personnel shall not be exposed to 85 dB(a) or 140 dB impulse where engineering or administrative controls are not instituted. (EM 385-1-40, Occupational Health, EM 385-1-1, Safety Manual)

SOLUTION: Conduct noise survey - Institute controls where needed.  
(1) Gate House Generator should be evaluated.  
(2) Heavy Equipment should be evaluated.

UNDERGROUND STORAGE TANKS (UST's) MANAGEMENT

FINDING: All UST's at Tully Lake have been recently replaced (FY-92) with tanks that meet or exceed all containment and monitoring regulations. (Photo 24)

## WASTEWATER MANAGEMENT

Wastewater is disposed of in septic tanks and leaching fields. No problems have been experienced with the septic tanks or leaching fields. A single system serves both the basin office and the utility building. The septic tank was last pumped in 1980. A second system, comprised of a 6,000 gallon septic tank, siphon chamber, distribution box and leaching field, serves the campground. This septic tank was pumped out annually by the State. In addition, port-a-johns are brought in during the summer to serve the boat ramp parking and recreation area immediately above the dam; these are cleaned out weekly.

## WATER QUALITY MANAGEMENT

There are two water supply wells at Tully Lake. Well TM-DW-1 is approximately 1,500 feet southwest of the basin office. It supplies the basin office and the utility building. It was drilled in 1948 to a depth of 316 feet. Reports on file in the utility building indicate that this well collapsed partially in subsequent years. In 1988, when a replacement pump was installed at depth of 200 feet, the depth of the well was reported as 252 feet. This well serves fewer than 25 people and has fewer than 15 service connections; therefore, it is not a public water supply. Although NED regularly monitors water quality at all well sites, federal and state regulations only require monitoring of public water supplies.

Well TM-DW-2, the second well, is located off Doane Hill Road at the recreational facility. The well is operated from May to September when the campground is open. Visitors' stays are limited to two weeks. This well is a public water supply because it serves more than 25 people. Furthermore, it is a transient noncommunity well as it does not serve the same population for six months or more. The Massachusetts Dept. of Environmental Management's (MA-DEM) Division of Forests and Parks operated the recreational facility from the time of completion of the project circa 1977, until the spring of 1992, when it terminated its lease. The well was installed by the Corps under a separate contract in 1976. Specification for supply contract DACW33-76-M-1764 called for drilling to an initial depth of 60 feet to obtain a minimum yield of 10 gallons per minute when pumped continuously for 8 hours daily. The drilling log is no longer on file with either Operations Directorate or the project office. In a telephone conversation June 2, 1992, Mr. Kirke Henshaw, proprietor of Henshaw Well Drilling and Pumping Systems of West Chesterfield, Massachusetts, recalled having drilled the well to a depth of 140 feet.

NED uses its Barre Falls Environmental Laboratory to collect samples and test for bacteria in drinking water samples. Sampling frequency is tied to usage. All wells are monitored at least quarterly during the months they are in operation. Monitoring for nitrates is required once per three year period. MA-DEP may require baseline sampling of organics and inorganics as part of the well registration and certification process.

FINDING: Minor Deficiency

CONDITION: The well at Tully Campground was turned over to NED from the Commonwealth of Massachusetts in 1992. In a telephone conversation May 21, 1992, Mr. Rodney Whipple of MA-DEM's Division of Forests and Parks Otter River State Forest, indicated his agency had not registered the recreational facility well with Massachusetts Department of Environmental Protection's (MA-DEP) Division of Water Supply.

CRITERIA: Under 40 CFR 142.10 (adopted under provisions of the Safe Drinking Water Act -- Public Law 93-523), a State has primary enforcement responsibility for public water systems in the State including certification of laboratories. Applicable Massachusetts monitoring requirements are codified in CMR 310-22. See also MA-DEP document entitled "Guidelines and Policies for Water Systems", dated October 1991. In order to comply with federal regulation 40 CFR 142.10 and state regulation 310 CMR 22, the Corps should register the well with MA-DEP.

SOLUTION: Register well.

COMMENT: Mr. Joseph Faloretti, Basin Manager, is coordinating with Mr. Stan Szczurko of MA-DEP's Division of Water Supply, Source Approval Branch, to register the Tully Lake recreational facility well.

NOTE: The well will probably be permanently closed prior to being registered by the Corps.

FINDING: Minor Deficiency.

CONDITION: Recreation facility well was turned over to NED in spring of 1992. NED will report results after well has been registered, because proper reporting requires an EPA identification number which can only be obtained by registering the well.

CRITERIA: Prompt reporting of result of potable water monitoring is required under provisions of the Safe Drinking Water Act -- Public Law 93-523.

SOLUTION: Results of routine monitoring of public water supplies should be promptly reported to the appropriate state agency by WCD or Laboratory, depending on turnaround time allowed by state regulations.

## RESERVOIR WATER QUALITY PROGRAM

The NED reservoir water quality control management program at Tully Lake has multiple goals: Its primary purpose is to protect public health and safety, but additional goals include meeting State water quality standards, maintaining water quality suitable for all project purposes, and understanding the effects of project operations on water quality. NED's Water Quality Team meets as needed during the year to determine water quality needs at each project, including Tully Lake, and carry out the annual program.

Although water quality management is not a defined project purpose at any project operated and maintained by NED, the Corps has a strong interest in water quality. Executive Order 11752, "Prevention, Control, and Abatement of Environmental Pollution at Federal Facilities," 19 December 1973, makes it a stated national policy that the Federal Government, in the design, construction, management, operation, and maintenance of its facilities, shall provide leadership in the nationwide effort resources. Section 102b of the Federal Water Pollution Control Act Amendments of 1972 places responsibility with EPA for determination of the need for, the value of, and the impact of storage for water quality control in any reservoir project not in a construction status as of 18 October 1972. The responsibility for water quality at Corps projects, however, clearly rests with the Corps since it is an integral part of our water control management activities (reference ER 1130-2-334 Apr 86 and ER 1130-2-415 Oct 76).

NEW ENGLAND DIVISION  
ERGO TEAM

Bruce Williams Program Manager  
Operations Directorate  
Project Operations and Readiness Division  
Environmental Compliance Coordinator - NED  
Coordinator, Radon Reduction Program - NED

Jim Law  
Operations Directorate  
Project Operations and Readiness Division

Mike Penko  
Planning Directorate  
Impact Analysis Division  
Endangered Species Coordinator - NED

Townsend Barker  
Engineering Directorate  
Water Control Division  
Chairman, NED's Water Quality Team

Vicki Volz  
Engineering Directorate  
Water Control Division

Jim Peck  
Safety and Occupational Health Office -  
Safety Manager - NED

Anne Laster  
Real Estate Directorate  
Conveyancing Division

LTC Douglas Outlaw - TDY  
EN, (IND. MOB. AUG.) New England Division  
Professional Engineer I  
Hazardous Waste Regulation Section  
State of Florida  
Department of Environmental Regulation

## **Appendix A**

# ERGO

## Environmental Review Guide for Operations

### PRE-ASSESSMENT ENVIRONMENTAL MANAGEMENT QUESTIONNAIRE

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment.

Name of Facility: TULLY LAKE

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
<b>SECTION 1, Air Emissions Management:</b>		
1. Does facility operate a fuel burner (central steam plant, or hot water or hot water steam boiler)?	<u>NO</u>	If YES see ERGO items 1-4 through 1-15.
2. Does facility operate an incinerator?	<u>NO</u>	If YES see ERGO items 1-16 through 1-18.
3. Does facility dispense, store, or transfer gasoline?  THE ONLY GASOLINE STORED AT THE PROJECT IS IN VEHICLES AND 5 GALLON CONTAINERS. (STORED IN FIREPROOF ROOM)	<u>NO</u>	If YES see ERGO items 1-19 through 1-23.
4. Does facility have volatile organic compounds (VOCs)(generally, but not exclusively, found in solvents)?  SMALL QUANTITIES (LESS THAN 5 GALLONS) MAY BE ON HAND IN THE FIRE PROOF ROOM.	<u>NO</u>	If YES see ERGO items 1-24 through 1-28.
5. Does facility have fugitive emissions from volatile hazardous air pollutant (VHAP) equipment?	<u>NO</u>	If YES see ERGO items 1-29 through 1-35.
6. Does facility use VOC-based solvent degreasers?  WE USE SOL+VEX. IT IS A SOLVENT BASED EMULSIFIABLE DEGREASER THAT RINSES READILY WITH WATER. THE MANUFACTURER RECOMMENDED USE AS AN ENGINE DEGREASER AND PARTS CLEANER. IT IS A PETROLEUM DISTILLATE BASE PRODUCT. MANUFACTURER: METRA CHEM CORP. 792 HARTFORD PIKE SHREWSBURY, MA 01545 TEL. 617-845-1193	<u>NO</u>	If YES see ERGO item 1-36.

## QUESTION/DESCRIPTION

## RESPONSE REFERENCE

**SECTION 2, Cultural and Historic Resources Management:**

1. Does the facility have any properties under its jurisdiction?

NO SIGNIFICANT CULTURAL OR HISTORIC  
RESOURCES HAVE BEEN IDENTIFIED AT THE  
PROJECT TO DATE. IT IS LIKELY THAT SOME  
MAY EXIT ON THE PROJECT.

YES

If YES see  
ERGO items 2-4  
through 2-10.

2. Does the facility have cultural resources? List the facility's  
cultural resources below:

NONE HAVE BEEN IDENTIFIED  
AT THIS TIME.

NO

If YES see  
ERGO items 2-  
11 through 2-14.

- a. Are the facility's master plan or operational management plan (OMP)  
public documents?

THE PROJECT MASTER PLAN IS A PUBLIC  
DOCUMENT, OR THE OMP WILL BE WHEN  
COMPLETED.

YES

If YES see  
ERGO item 2-  
13.

3. Does the facility have an operational project?

YES

If YES see  
ERGO item 2-  
15.

4. Does the facility have any Native American graves or artifacts, or  
have any been discovered during an operation?

CULTURAL RESOURCES INVENTORY HAS  
NOT BEEN COMPLETED.

NO

If YES see  
ERGO item 2-  
16.

5. Does the facility have an archeological or historical collection?

NO

If YES see  
ERGO items 2-  
17 through 2-28.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
<b>SECTION 3, Hazardous Materials Management:</b>		
1. Does the facility store any hazardous materials?	<u>NO</u>	If YES see ERGO items 3-5 through 3-8.
NO MSDS ARE ON HAND FOR HAZARDOUS MATERIALS. FACILITY INSPECTED BY SAFETY OFFICER SUMMER OF 1991		
2. Have there been any releases of hazardous substances at the facility?	<u>NO</u>	If YES see ERGO items 3-9 through 3-11.
3. Are there any extremely hazardous substances at the facility?	<u>NO</u>	If YES see ERGO item 3-12 and 3-13.
4. Does the facility: Have extremely hazardous substances in excess of 500 lbs or the threshold planning quantity (see appendix III-1); have hazardous chemicals in excess of 10,000 lbs; or fall under Standard Industrial Classification Codes 20 to 39?	<u>NO</u>	If YES see ERGO item 3-12 and 3-13.
5. Does the facility store compressed gases, flammable/combustibles, or acids?	<u>YES</u>	If YES see ERGO items 3-14 through 3-27.
WELDING TANKS. FLAMMABLE LIQUIDS STORED IN FIREPROOF ROOM.		
6. Does the facility transport hazardous material, or offer such materials for transport?	<u>YES</u>	If YES see ERGO items 3-28 through 3-31.
PACKING, MARKING AND SHIPPING IS DONE BY LICENSED CONTRACTOR. EPA I.D. NO. (MA 2960000.9817) A COPY OF THE LETTER FROM EPA TO TULLY LAKE DATED JULY 20, 1987 ENCLOSED.		

## QUESTION/DESCRIPTION

RESPONSE

REFERENCE

**SECTION 4, Hazardous Waste Management:**

1. Is facility a generator of hazardous waste?

PRINTING INK, INK SOLVENTS AND CLEANERS  
ARE USED AT THE PROJECT.

YESIf YES see  
ERGO items 4-8  
through 4-15.

a. Is facility a small quantity generator?

NOIf YES see  
ERGO items 4-  
16 through 4-18.

b. Is facility a very small quantity generator?

WE ARE WITHIN THE REGULATORY REQUIREMENTS  
FOR A VERY SMALL QUANTITY GENERATOR. IN THE PAST  
WE HAVE RECEIVED HAZARDOUS WASTE FROM OTHER LCRB PROJECTS  
FOR DISPOSAL BY CONTRACTOR. ATTACHED MANIFEST, SHIPPING DOCUMENTS, ETC.

Complete this section before proceeding.

YESIf YES see  
ERGO item 4-  
19.

Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F)
- or Corrosivity (pH <2 or >12.5)
- or TCLP Toxicity (for As,Ba,Cd,Cr,Pb,Hg,Se,Ag, and selected pesticides)
- or Reactive. (or CN)

The following are hazardous wastes that may typically be found at a Corps facility:

CHECK IF USED AT THIS FACILITY	Vol Gen/mo lb.	Vol Accum lb.	Vol Accum Kg.
— Solvents	—	—	—
✓ Liquid Paint	—	—	—
✓ Paint stripper, remover, or thinner	—	—	—
— Spray paint booth air filters	—	—	—
✓ Pesticides, Insecticides, Herbicides, etc.	—	—	—
— NBC filters and test kits	—	—	—
— DS2 (diethylene triamine)	—	—	—
— STB (super topical bleach)	—	—	—

SEE ATTACHED REPORT

— Ordnance, ammunition, explosives & residues  
 — Battery acid & Caustics (in unserviceable batteries)  
 — Some pharmaceuticals  
 — POL Tank Farm fuel system filters  
 — De-icing solution  
 ✓ Printing ink, ink solvents and cleaners  
 — Absorbant materials and soil contaminated with hazardous waste  
 — Other \_\_\_\_\_  
 — Other \_\_\_\_\_  
 — Other \_\_\_\_\_  
**TOTAL**

e.g., Trichlorethane, Methylene, chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon Tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Break-free in liquid form, Mineral Spirits, Xylene

USEPA Generator Designation:  Unregulated  Small Qty  Large Qty

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
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2. Does facility export/import hazardous waste from/to the United States?

NO

If YES see ERGO items 4-23 through 4-31.

3. Does facility transport hazardous waste?

NO

If YES see ERGO items 4-32 through 4-37.

4. Does facility have a treatment, storage, or disposal facility (TSDF)?

NO

If YES see ERGO items 4-38 through 4-74.

## QUESTION/DESCRIPTION

## RESPONSE

## REFERENCE

a. Does the TSD facility receive waste from a foreign source?

NO

If YES see  
ERGO item 4-  
42.

b. Does facility receive waste from off-site sources?

WE COMPLY WITH MANIFEST REQUIREMENTS. IN THE PAST WE RECEIVED MATERIAL FROM OTHER DAMS, PRIOR TO SHIPMENT BY LICENSED HAZARDOUS DISPOSAL COMPANIES.

YES

If YES see  
ERGO items 4-  
46 and 4-47.

c. Does facility handle ignitable, reactive, or incompatible wastes?

WASTES ARE PROTECTED FROM SOURCES OF IGNITION. WASTE MOTOR OIL, THINNERS.

YES

If YES see  
ERGO item 4-65  
and 4-67.

5. Does facility have hazardous waste containers?

CONTAINERS ARE KEPT IN DESIGNATED STORAGE AREAS. CONTAINERS ARE IN GOOD CONDITION AND NOT LEAKING.

YES

If YES see  
ERGO items 4-  
75 through 4-  
86.

6. Does facility store hazardous wastes in tanks?

NO

If YES see  
ERGO items 4-  
87 through 4-  
101.

7. Does facility use surface impoundment as a means of treatment, storage, or disposal of hazardous wastes?

NO

If YES see  
ERGO items 4-  
102 through 4-  
110.

8. Does facility have waste piles?

NO

If YES see  
ERGO items 4-  
111 through 4-  
118.

9. Does facility have land treatment of hazardous waste?

NO

If YES see  
ERGO items 4-  
119 through 4-  
126.

10. Does facility have hazardous waste in landfills?

YES

WE HAVE A STORAGE AREA/DUMP NEAR THE SPILLWAY. SEE ATTACHED MAP.

If YES see  
ERGO items 4-  
127 through 4-  
137.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
11. Does facility incinerate hazardous waste?	<u>NO</u>	If YES see ERGO items 4-138 through 4-147.
12. Does facility dispose of hazardous waste in miscellaneous units?	<u>NO</u>	If YES see ERGO items 4-148 and 4-149.
13. Does facility have thermal treatment facilities?	<u>NO</u>	If YES see ERGO items 4-150 through 4-152.
14. Does facility have chemical, physical, or biological treatment facilities?	<u>NO</u>	If YES see ERGO items 4-153 through 4-155.
15. Does facility have restricted wastes?	<u>NO</u>	If YES see ERGO items 4-156 through 4-168.

#### SECTION 5, Natural Resources Management:

1. Does facility have any construction projects?  
OMP IS UNDER DEVELOPMENT AND MASTER NO  
PLAN REQUIRES UPDATE.
- If YES see ERGO item 5-4.
2. Does facility have land management responsibilities?  
EROSION IS NOT A PROBLEM WITH THE  
EXCEPTION OF THE ISLANDS. YES
- If YES see ERGO items 5-7 and 5-8.
3. Does facility have floodplains or wetlands?  
FLOODPLAINS & WETLANDS HAVE BEEN  
IDENTIFIED. MAPS ENCLOSED. YES
- If YES see ERGO item 5-9.
4. Does facility contain a shoreline? NO
- If YES see ERGO item 5-12.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
5. Does facility have endangered or threatened species? THE PROJECT DOES NOT HAVE A SPECIFIC ENDANGERED SPECIES INVENTORY. TRANSIENT BALD EAGLES HAVE BEEN SIGHTED ON SEVERAL OCCASIONS. THE TINY COW LILY IS ALSO PRESENT IN LONG POND. OTHER THREATENED SPECIES MAY ALSO BE PRESENT. SECTION 6, Pesticides Management:	YES	If YES see ERGO items 5- 13 and 5-14.
1. Do facility personnel engage in the application of pesticides?	NO	If YES see ERGO items 6-7 through 6-16.
2. Does facility store, mix, or formulate pesticides? WE STORE SMALL AMOUNTS OF INSECT REPELLENT AND WASP STOPPER. SEE ATTACHED HAZARDOUS MATERIALS INVENTORY SHEET.	YES	If YES see ERGO items 6- 17 through 6-28.
a. Does facility store/use pesticides classified highly toxic or moderately toxic (bearing DANGER, POISON, WARNING, or the skull and crossbones symbol)?  SAME AS 2 - SEE ATTACHED HAZARDOUS MATERIALS INVENTORY SHEET	YES	If YES see ERGO items 6- 20 through 6-27.
3. Does facility dispose of pesticides?	NO	If YES see ERGO items 6- 29 through 6-33.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
<b>SECTION 7, Petroleum, Oil and Lubricant (POL) Management:</b>		
1. Does the facility store, transport, or dispense petroleum products?  WE STORE 5 GALLON CANS OF GASOLINE AND DIESEL FOR UTILITIES.	<u>NO</u>	If YES see ERGO items 7-5 through 7-12.
2. Have there been any discharges of oil at the facility?	<u>NO</u>	If YES see ERGO items 7-13 through 7-14.
3. Does the facility have any bulk storage tanks over 660 gallons?  THE LARGEST TANKS ON THE FACILITY ARE 550 GALLON #2 FUEL OIL TANKS FOR HEATING BUILDINGS.	<u>NO</u>	If YES, see ERGO item 7-16.
4. Does the facility use dikes as a means of containment for petroleum storage tanks?	<u>NO</u>	If YES see ERGO items 7-17 and 7-18.
5. Does the facility have any pipelines?  YES. UNDERGROUND PIPES ARE USED TO TRANSFER FUEL FROM UNDERGROUND TANKS TO FURNACES AT UTILITY BUILDING AND GATE HOUSE. TANKS HAVE CATHODIC PROTECTION AND TANKS ARE DOUBLE WALLED TO CONTAIN LEAKS.	<u>YES</u>	If YES see ERGO items 7-20 through 7-22.
6. Does the facility sell used oil?	<u>NO</u>	If YES, see ERGO item 7-23.
<b>SECTION 8, Solid Waste Management:</b>		
1. Does the facility collect or store solid waste on site?  SOLID WASTE IS STORED IN A CLOSED DUMPSTER. CONTRACT # DACW3391M0411 RENEWABLE WEEKLY PICK UP.	<u>YES</u>	If YES, see ERGO items 8-4 through 8-12.
2. All Corps facilities must should recycle and reduce solid waste.  WE RECYCLE HIGH GRADE PAPER.	<u>YES</u>	See ERGO item 8-13.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
a. Does facility have over 100 office workers?	<u>No</u>	If YES see ERGO item 8-14.
b. Do more than 500 families reside at the facility?	<u>No</u>	If YES see ERGO item 8-15.
c. Does the facility generate waste corrugated containers?	<u>No</u>	If YES see ERGO item 8-16.
3. Does facility have land disposal on site?  WE HAVE A STORAGE AREA NEAR THE SPILLWAY. MAP ENCLOSED.	<u>YES</u>	If YES see ERGO items 8-17 through 8-31.
a. Does facility dispose of water treatment plant sludges?	<u>No</u>	If YES see ERGO 8-18.
b. Does facility dispose of incinerator or air pollution control residues?	<u>No</u>	If YES see ERGO item 8-19.
c. Does the facility accept special wastes?	<u>No</u>	If YES see ERGO item 8-21.
4. Does the facility have a closure site?	<u>No</u>	If YES, see ERGO items 8-32 and 8-33.
5. Does the facility have a new landfill site?	<u>No</u>	If YES, see ERGO items 8-34 and 8-35.
6. Does facility have a thermal processing facility?	<u>No</u>	If YES see ERGO items 8-36 through 8-49.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
7. Does the facility utilize resource recovery facilities?	<u>NO</u>	If YES see ERGO items 8-50 and 8-51.
a. If the facility does NOT utilize resource recovery facilities, a report must be filed with the Administrator explaining the decision not to utilize.  WE ARE NOT LARGE ENOUGH, NOR DO WE GENERATE ENOUGH SOLID WASTE TO USE RESOURCE RECOVERY FACILITIES.	<u>NO</u>	See ERGO item 8-50.
<b>SECTION 9, Special Pollutants Management:</b>		
1. Does facility have PCBs of any kind?	<u>NO</u>	If YES, see ERGO items 9-4 through 9-11.
a. Does facility have a PCB waste landfill?	<u>NO</u>	If YES, see ERGO item 9-10.
b. Does facility have PCB storage or disposal facilities?	<u>NO</u>	If YES, see ERGO item 9-11.
2. Does facility have PCB transformers?	<u>NO</u>	If YES, see ERGO items 9-12 through 9-18.
3. Has facility had a PCB spill?	<u>NO</u>	If YES see ERGO item 9-19.
4. Does facility have PCB Items (PCB-contaminated heat transfer or hydraulic systems, electromagnets, switches, voltage regulators, capacitors, circuit breakers, reclosers, or cables)?	<u>NO</u>	If YES see ERGO items 9-20 through 9-23.
5. Does facility use PCBs in research?	<u>NO</u>	If YES see ERGO item 9-24.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
6. Does facility store PCBs?	<u>NO</u>	If YES see ERGO items 9-25 through 9-29.
7. Does facility transport PCBs or PCB Items?	<u>NO</u>	If YES see ERGO items 9-30 and 9-31.
8. Does facility dispose of PCBs or PCB Items?	<u>NO</u>	If YES see ERGO items 9-32 through 9-41.
9. Does facility demolish, renovate, or strip components from structures containing friable asbestos?	<u>NO</u>	If YES see ERGO items 9-42 through 9-52.
10. Does facility dispose, or transport for disposal, asbestos or asbestos-containing waste?  IN THE PAST WE HAVE STORED ASBESTOS AND DISPOSED OF IT PROPERLY. DOCUMENTATION ENCLOSED.	<u>YES</u>	If YES see ERGO items 9-53 through 9-57.
11. Is facility located in an area with a potential radon problem?  AN INITIAL TEST READING OF 6. PC/LITER FOR RADON WAS RECORDED IN 1989-1990 IN THE BASIN OFFICE BASEMENT. FOLLOW UP MONITORING IS CURRENTLY BEING CONDUCTED.	<u>YES</u>	If YES see ERGO items 9-58 through 9-60.
12. Does facility have any possible sources of noise pollution, or have a noise hazardous area?	<u>NO</u>	If YES see ERGO items 9-61 through 9-68.
<b>SECTION 10, Underground Storage Tanks (USTs) Management:</b>		
1. Does facility have organizational fuel tanks?	<u>NO</u>	If YES see ERGO item 10-5.
2. Has facility repaired, or is it planning to repair, a UST?	<u>NO</u>	If YES see ERGO item 10-10.

QUESTION/DESCRIPTION	RESPONSE	REFERENCE
3. Does facility have hazardous waste USTs?	<u>NO</u>	If YES see ERGO item 10-19.
4. Does facility have a deferred UST?	<u>NO</u>	If YES see ERGO item 10-20.
5. Does facility have a metallic UST? DOUBLED WALL TANKS WITH LEAK MONITORING SYSTEM. DESCRIPTION ENCLOSED.	<u>YES</u>	If YES see ERGO items 10-23 and 10-35.
6. Does facility have newly-installed USTs (i.e., after May, 1986)? DOCUMENTATION ENCLOSED	<u>YES</u>	If YES see ERGO items 10-24 through 10-27.
7. Have facility USTs undergone a change of service, or closure?	<u>NO</u>	If YES see ERGO items 10-28 through 10-34.
8. Does facility have substandard USTs?	<u>NO</u>	If YES see ERGO item 10-35.
<b>SECTION 11, Wastewater Management:</b>		
1. Does facility have a floating plant?	<u>NO</u>	If YES see ERGO item 11-4.
2. Does facility have any point source discharges, or does facility have domestic sewage treatment plants?	<u>NO</u>	If YES see ERGO items 11-5 through 11-8.

## QUESTION/DESCRIPTION

## RESPONSE REFERENCE

3. Does facility have storm water discharge not covered by a NPDES permit?

NO

If YES see  
ERGO item 11-  
9.

4. Does facility discharge to a privately-owned treatment works (POTW)?

NO

If YES see  
ERGO items  
11-10 through  
11-12.

5. Does facility have any personnel engaged in the operation of water pollution control devices?

NO

If YES see  
ERGO item 11-  
13.

6. Does facility have a wastewater treatment plant?

NO

If YES see  
ERGO items  
11-14 and 11-15.

7. Does facility have electroplating operations?

NO

If YES see  
ERGO item 11-  
16 through 11-  
27.

8. Does facility conduct or issue permits for dredging operations?

NO

If YES see  
ERGO items  
11-28 through  
11-35.

## SECTION 12, Water Quality Management:

1. Does facility perform contaminant monitoring on its water supply?

TESTS FOR TOTAL COLIFORM 4 TIMES/YEAR.  
3 YEAR TEST  
NITRATES, SODIUM

TURBIDITY TESTED ON OCCASION. NO STANDARDS FOR  
NON CLORINATED WELLS.

2. Is facility located near a sole source aquifer?

YES

If YES see  
ERGO items  
12-18 through  
12-43.

NO

If YES see  
ERGO item 12-  
44.

## QUESTION/DESCRIPTION

## RESPONSE REFERENCE

3. Does facility use surface water or ground water under the influence of surface water for drinking water?

NO

If YES see  
ERGO items  
12-45 through  
48.

4. Does facility have recreational potable water sources?

CAMPGROUND HAS POTABLE WATER SOURCE.  
TESTING HAS PREVIOUSLY BEEN CONDUCTED BY STATE  
OF MASS. OTTER RIVER STATE FOREST.

YES

If YES see  
ERGO item 12-  
49.

5. Does facility have swimming beaches?

NO

If YES see  
ERGO item 12-  
50.

6. Does facility have swimming pools?

NO

If YES see  
ERGO item 12-  
51.

7. Do facility's waters support watercraft?

ONLY SMALL BOATS (CANOES, ROWBOATS, SAILBOATS,  
POWERBOATS WITH ≤ 10 H.P. MOTORS) ARE PERMITTED  
ON FACILITY'S WATER TITLE 36 CFR IS POSTED  
AND CORPS RANGERS PATROL.

YES

If YES see  
ERGO items  
12-52.

8. Is facility authorized to provide emergency drinking water?

NO

If YES see  
ERGO item 12-  
53.

Signature of individual completing this form:

Martin J Curran

Date completed: 4/22/92



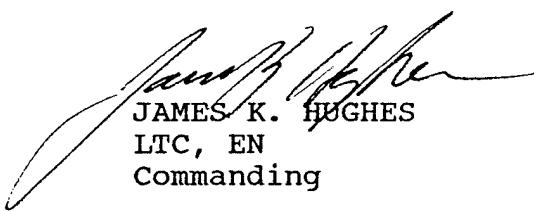
## **Appendix B**

12 June 1992

## MEMORANDUM FOR NED Executive Staff

SUBJECT: NED Environmental Compliance Coordinator

1. In January 1991, John Elmore, Chief, Operations, Construction and Readiness Division, directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECC's). The Director of Operations designated Bruce Williams, Project Operations and Readiness Division as the New England Division ECC.
2. In a follow-up memo dated 31 March 1992, The Director of Civil Works expanded the role of the Environmental Compliance Coordinators to be utilized as division or district environmental coordinators. This is a coordination, as opposed to an operative assignment. The ECC's will support rather than assume environmental compliance responsibilities of the various functional elements (Planning, Engineering, Project Program Management, Logistics, Safety and Occupational Health, and Real Estate, etc.).
3. The Corps of Engineer objective is to develop and maintain a comprehensive and consistent environmental compliance program utilizing the existing Operations "stovepipe", since Operations is responsible for the majority of Corps facilities. In the future, the ECC should be included in the review process of programs or projects that involve environmental compliance as part of the construction, operation or maintenance activities at Corps owned or operated facilities and projects.
4. As a part of the USACE Facilities Environmental Compliance Program, the Director of Civil Works recommended that Commanders should also establish and chair an interdisciplinary Environmental Compliance Steering Committee with representatives from the various affected offices throughout NED. Rather than develop parallel organizations performing the same function, I am tasking the NED Executive Staff to serve an additional function as the Environmental Compliance Steering Committee. The Director of Operations will provide direction and oversight to the ECC and overall coordination with NED Executive Staff.



JAMES K. HUGHES  
LTC, EN  
Commanding

cf:

Distribution "A"  
Bruce Williams ECC



## DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers  
WASHINGTON, D.C. 20314-1000REPLY TO  
ATTENTION OF:

2 MAR 1992

S: 31 March 1992

CECW-OA

MEMORANDUM FOR COMMANDERS, ALL MAJOR SUBORDINATE COMMANDS,  
DISTRICT COMMANDS, AND LABORATORIES

SUBJECT: USACE Facilities Environmental Compliance

1. In June 1991, Lieutenant General H. J. Hatch, Chief of Engineers, assigned me the mission of assuring that all USACE facilities and associated lands meet environmental standards contained in relevant Federal, DoD, Army, state, and local laws and regulations. In an effort to ensure USACE facilities environmental compliance, commanders are directed to initiate an environmental assessment/deficiency correction program for all Corps property utilizing the Environmental Review Guide for Operations (ERGO). Our overall goal is to complete environmental assessments and develop corrective action plans at all Corps projects and facilities by the end of FY94.
2. ERGO is a checklist of environmental laws and regulations, good management practices, and risk management issues. ERGO was designed as a self assessment tool, but can also be used for formal, or external assessments. Project and facility managers, with technical assistance from district elements, state authorities or private sector contractors, can use ERGO to determine if their operations are being conducted in accordance with environmental laws and regulations. ERGO assessments are a proactive approach to environmental compliance and protection. Findings identified in ERGO assessments should be prioritized and remediation measures performed as routine maintenance work or programmed in the budget process.
3. Civil Works Operations elements are already implementing ERGO, with a goal of completing ERGO assessments at 25 percent of Corps O&M General funded operating projects and facilities this FY. I now ask that you schedule and conduct ERGO assessments at facilities and projects operated with other than O&M General funds (e.g. Mississippi River and Tributaries funded projects, district motor pools, regional warehouses, Corps operated printing plants and photo labs, etc.).
4. ERGO was initially developed for use at operating projects. Since we are now expanding its application, you may find that some refinement is required to thoroughly assess facilities not considered when preparing the current manual. Contact Dr. Diane Mann of CERL-ENM at (217) 373-6741, for help in dealing with facilities and regulations not currently covered in the manual.

CECW-ON

SUBJECT: USACE Facilities Environmental Compliance

1 MAR 1992

Recommendations for improving the checklist can be directed to Dr. Mann at Department of the Army, Construction Engineering Research Laboratory, Corps of Engineers, P.O. Box 9005, Champaign, Illinois 61826-9005. From efficiency and comparative standpoints we are committed to using a single environmental compliance protocol throughout USACE.

5. I encourage all elements to take a teamwork approach, using existing expertise, rather than developing parallel organizations performing the same function, to initiate, develop, and maintain environmental compliance and assurance at all USACE operated and funded projects, facilities, and activities. This teamwork approach will minimize duplicating effort and assessment costs. Commanders, if they have not already done so, should also establish and chair an interdisciplinary Environmental Compliance Steering Committee with representatives from the various affected offices throughout your organization. The steering committee will provide direction and oversight.

6. In January 1991, John Elmore, Chief, Operations, Construction and Readiness Division, directed division and district operations offices to formally designate Environmental Compliance Coordinators (ECCs). Hereafter, these coordinators will be utilized as division or district environmental compliance coordinators. This is a coordination, as opposed to an operative, assignment. The ECCs will support rather than assume environmental compliance responsibilities of the various functional elements (Planning, Engineering, Project Program Management, Logistics, Safety and Occupation Health, and Real Estate). Our objective is to develop and maintain a comprehensive and consistent environmental compliance program, utilizing the existing Operations "stovepipe", since Operations is responsible for the majority of USACE facilities.

7. We will distribute revised ERGO manuals and follow on compliance materials to each currently designated division and district ECC for dissemination to offices involved in environmental compliance throughout your organization. If there are any updates to the current list of ECCs, please forward their name, office symbol, FTS and commercial telephone numbers, Fax number, and Corps Mail I.D. to CECW-OA, ATTN: Jim Wolcott, by 31 March 1992. Field Operating Activities and Laboratories should also designate and provide information on ECCs.

FOR THE COMMANDER:



ARTHUR E. WILLIAMS  
Major General, USA  
Director of Civil Works



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers  
WASHINGTON, D.C. 20314-1000

06 NOV 1991

REPLY TO  
ATTENTION OF:

CECW-ON (1130-2-2)

MEMORANDUM FOR COMMANDERS, ALL MAJOR SUBORDINATE COMMANDS,  
DISTRICT COMMANDS, FIELD OPERATING ACTIVITIES  
AND LABORATORIES

SUBJECT: USACE Facilities Environmental Compliance Program  
(Internal)

1. I recently reassigned the mission of assuring that all USACE facilities and associated lands meet environmental standards contained in relevant Federal, DoD, Army, state, and local laws and regulations to the Director of Civil Works. This action is in response to your comments regarding implementing an environmental compliance initiative within USACE.
2. Program oversight will be provided by a steering committee chaired by the Deputy Director of Civil Works, with Logistics, Military Programs, Office of Counsel, Real Estate, Research and Development, Safety and Occupational Health and the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) represented. An Environmental Compliance Branch within Operations, Construction and Readiness Division will develop, coordinate, and manage the program. Civil Works will provide further details as the USACE Facilities Environmental Compliance Program unfolds.
3. The Corps has an ethical and legal obligation to protect our environment through prevention, compliance, restoration and stewardship. We are counting on your support and enthusiasm, coupled with the evolving USACE Facilities Environmental Compliance Program, to demonstrate our commitment to, and capabilities in, environmental protection.

H. J. HATCH  
Lieutenant General, USA  
Commanding



## DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers  
WASHINGTON, D.C. 20314-1000REPLY TO  
ATTENTION OF:

S: 15 February 1991

CECW-ON

## MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS AND DISTRICT COMMANDS

SUBJECT: Environmental Review Guide for Operations (ERGO)

1. I am enclosing the Environmental Review Guide for Operations (ERGO), a checklist for analyzing compliance with environmental laws and regulations at our operating projects. Copies are being sent to all District Operations offices for distribution to projects. We are releasing ERGO as a test document for use during the remainder of FY 91. An implementation workshop is in the planning stage. Specifics will be provided later.
2. Lieutenant General Hatch, in his 14 February 1990 letter, "Strategic Direction for Environmental Engineering", echoed Secretary Cheney's call for DOD to be the "Federal leader in environmental compliance and protection." ERGO is a pro-active approach to compliance.
3. The Construction Engineering Research Laboratory developed ERGO. A steering committee with Division, District and project members from Operations elements provided guidance and direction. Their goal was to produce a self-assessment tool for managers of operating projects with District teams, State agencies, contractors and the United States Army Toxic and Hazardous Waste Agency as potential sources of support.
4. Environmental compliance is a legal and ethical responsibility, an integral part of doing business. I ask that you apply ERGO at one or more projects in each District this FY.
5. We will need feedback to update ERGO for full implementation in FY 92. Every Division and District Operations office should formally designate an environmental compliance coordinator. These individuals will be our POCs regarding ERGO and other environmental matters. They will act as liaisons with the various functional areas within Operations organizations, and with POCs from other elements with environmental responsibilities. Please forward the names, office symbols, and telephone numbers of your Division and District environmental compliance coordinators to CECW-ON, ATTN: Jim Wolcott by 15 February 1991.

FOR THE DIRECTOR OF CIVIL WORKS:

A handwritten signature in black ink, appearing to read "John P. Elmore".

JOHN P. ELMORE

Chief, Operations, Construction and  
Readiness Division  
Directorate of Civil Works



DEPARTMENT OF THE ARMY  
U.S. Army Corps of Engineers  
WASHINGTON, D.C. 20314-1000

2 DEC 1991

REPLY TO  
ATTENTION OF:

WS: 10 January 1992

CECW-ON

MEMORANDUM FOR MAJOR SUBORDINATE COMMANDS

SUBJECT: FY 92 Environmental Assessments at Operating Projects

1. As managers of over 400 water resources projects and stewards of 11.7 million acres of land and water, we individually and corporately have an ethical and legal responsibility to protect the environment. Your positive response to the Environmental Review Guide for Operations (ERGO) we distributed last January is appreciated. We are now ready to proceed with an organization-wide series of ERGO assessments. The FY 92 target is to complete ERGO assessments at 25 percent of our O&M General funded operating projects and facilities. The remainder will be assessed within the following two years. Assessments of facilities and projects operated with other than O&M General funds will be addressed by separate memorandum.

2. As an indication of the importance of this effort, we are providing dedicated O&M funding from headquarters to insure that these assessments are completed. Enclosed is a list of funds available for allocation to each division. These funds are for conducting assessments and converting findings into corrective action plans. Corrective actions are to be implemented through routine budgeting and reprogramming procedures. We ask that you respond with a list of projects, by district, at which ERGO evaluations will be conducted in FY 92, and the portion of your division's total allocation we should distribute to each project on your list. Include the CWIS number with each project you identify. Please respond to Denise White of our Natural Resources Management Branch (CECW-ON) by 10 January 1992.

3. In selecting projects and facilities for FY 92 assessments, we recommend that you concentrate on locations having the greatest potential for significant compliance shortfalls. When evaluating projects, evaluate all functions (hydropower, recreation, etc.) at the same time, to obtain comprehensive project assessments and action plans.

4. Our overall FY 92 budget for ERGO assessments is based on an estimated average cost of \$13K per project. To contain costs, use ERGO in conjunction with the representative sampling techniques presented at the Kansas City and Dallas ERGO orientation sessions.

CECW-ON  
SUBJECT: FY 92 Environmental Assessments at Operating Projects

Contact Dr. Diane Mann of Construction Engineering Research Laboratory (CERL) at 217-373-6741 for help in designing representative sampling formats.

5. ERGO was developed as a self-assessment tool for managers of operating projects, with district teams, state agencies, and contractors as potential sources of support. Because of the complexity of the laws and regulations, several respondents from the FY 91 effort commented on the benefits of inter disciplinary teams, including representation from offices such as Engineering, Logistics, Planning, Real Estate, and Safety and Occupational Health. While we are not specifying the way this first round of assessments is to be conducted, we are requiring the involvement, to the extent possible, of personnel from the project or facility being assessed to maximize training benefits. We are also emphasizing quality products that will withstand independent scrutiny.

6. Real Estate is responsible for reviewing user compliance with real estate instrument provisions, and reviewing environmental compliance clauses in such outgrants. ERGO is designed to apply to operating projects and facilities, including outgrants. We understand that in some locations the concept of applying ERGO to outgrants and concessions is surfacing unanticipated issues. Outgrant related issues will be addressed at the joint Real Estate/Natural Resources Meeting scheduled for January 1992. Please be sure that your representatives come to that meeting with complete and current information, both positive and negative. More specific guidance will be issued following that meeting.

7. In January 1992, we will distribute an updated ERGO manual reflecting FY 91 user feedback and incorporating new and revised laws and regulations. As you proceed with ERGO assessments in FY 92, it is especially important that you record "lessons learned" and track costs per assessment, including report and action plan development costs.

8. In support of our commitment to promote environmental compliance at all levels and functions, we have tasked CERL with developing and conducting ERGO orientation programs at our districts during the FY 92/93 time frame. A video based ERGO training course has also been approved for development by Huntsville Division. Additional information will be provided as these projects progress.

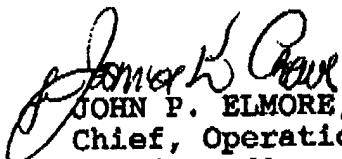
CECW-ON

SUBJECT: FY 92 Environmental Assessments at Operating Projects

Periodic environmental assessments are conducted by the environmental compliance program and your comments and recommendations are welcome at any time. They can be directed to Denise White at 202-272-0794.

FOR THE DIRECTOR OF CIVIL WORKS:

Encl

  
JOHN P. ELMORE, P.E.  
Chief, Operations, Construction  
and Readiness Division  
Directorate of Civil Works

**ENVIRONMENTAL REVIEW GUIDE FOR OPERATIONS (ERGO)**  
**FISCAL YEAR 92 BUDGET DISTRIBUTION**

The following is a listing of funding distribution in thousands of dollars to division offices for performing ERGO assessments.  
NOTE: Construction General (CG) and Mississippi River and Tributaries (MR&T) funded projects were not considered.

<u>Division</u>	<u>Amount</u>
LMD	145.0
MRD	105.0
NAD	95.0
NCD	210.0
NED	105.0
NPD	130.0
ORD	455.0
SAD	185.0
SPD	65.0
SWD	<u>430.0</u>
<b>TOTAL</b>	<b>1,925.0</b>



DEPARTMENT OF THE ARMY

U.S. ARMY CORPS OF ENGINEERS  
KINGMAN BUILDING  
FORT BELVOIR, VA 22000-

REPLY TO  
ATTENTION OF:

CEIG-I (20-1g)

17 DEC 1991

MEMORANDUM FOR ALL DISTRICT AND DIVISION COMMANDERS

SUBJECT: Environmental Compliance Concerns Within USACE

1. Earlier this year my office completed a systemic inspection of environmental compliance on lands controlled by USACE. A copy of this report has been recently distributed to your command and should be reviewed by you and members of your staff. We reported to the Chief that compliance problems exist across USACE with the many Federal, State and local environmental laws. We found at HQUSACE, and throughout the Corps:

- a. Organizational confusion as to who was in charge of environmental compliance.
  - b. Lack of comprehensive guidance.
  - c. Lack of Corps-wide policy on disposal of our hazardous materials and hazardous waste.
  - d. Training shortfalls.
  - e. Inadequate environmental assessment/inspection on lands we control.
  - f. Failure to program resources to insure environmental compliance.
  - g. Problems with environmental compliance on Corps lands leased to others for use.
  - h. Unfulfilled commitments to mitigate environmental impact on many Corps projects.
2. Our inspection teams visited fourteen districts in eight divisions and a laboratory. Inspectors physically toured over 240 different sites. They found compliance issues at virtually every site visited. Enclosed are pictures of typical findings.
3. I would like to emphasize that the situations shown in the pictures are typical and were not found at only one location or in any one particular district. Rather, they are likely to exist at any site or possibly at every site. I urge you and your staff to make it a special point to visit all land under your jurisdiction, especially lands leased and outgranted to others, with a keen eye to discover any environmental compliance

CEIG-I (20-1g)

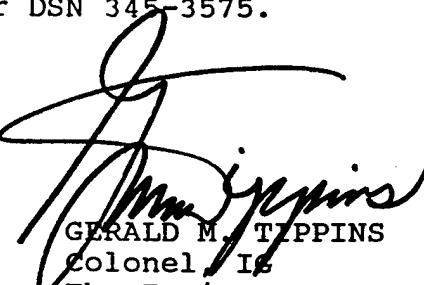
SUBJECT: Environmental Compliance Concerns Within USACE

violations or problems. You then need to follow through and insure resources are programed and dedicated to correct these problems in a timely fashion.

4. The U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) is available to answer environmental questions at 1-800 USA EVHL. My POC for this action is LTC Dan Shuey or LTC Fred Streb at Commercial (703)355-3575 or DSN 345-3575.

FOR THE COMMANDER:

Encl



GERALD M. TIPPINS

colonel IE

The Engineer Inspector General

CF:

CECER

CECRL

CETEC

CEWES

CEHSC

CETHA

CECW-ZA (MG Williams)

CECW-O (Mr. Elmore)

**ENVIRONMENTAL INSPECTION PHOTOGRAPHS**



**Photograph 1**

Storage Area

**Area of Concern:**

1. Violation of RCRA, CERCLA, and TSCA
2. Soil Contamination
3. Improper storage/disposal of HTW

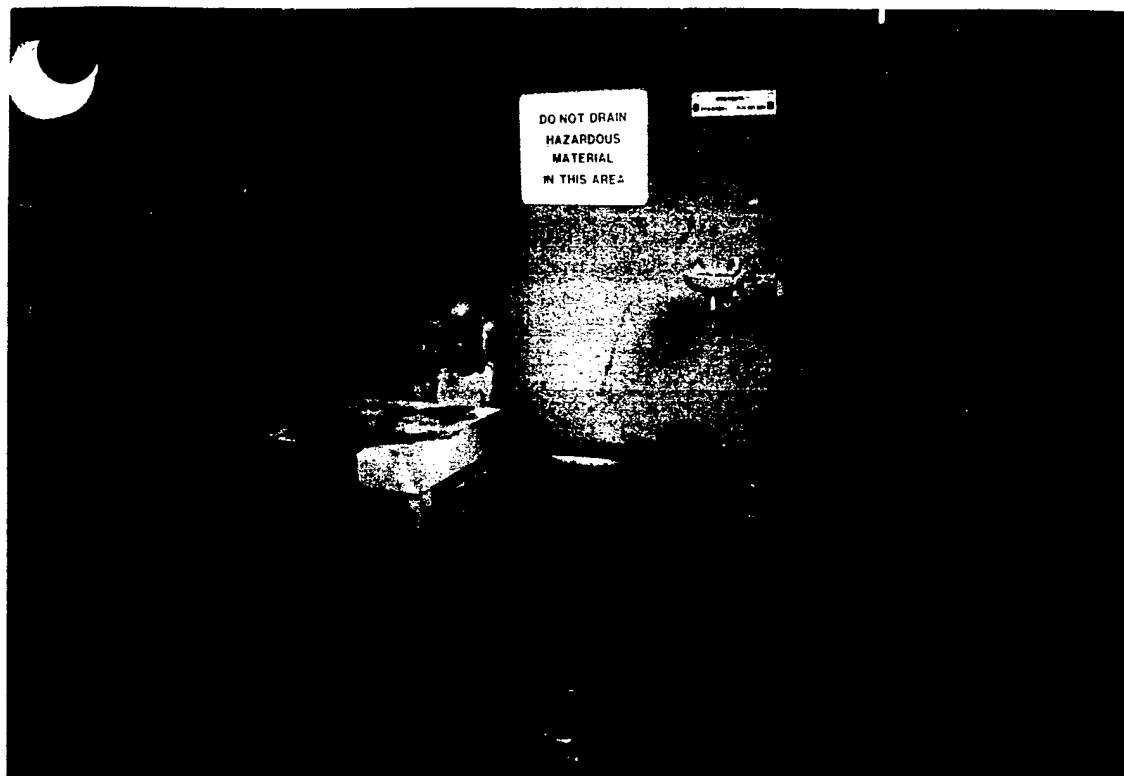


**Photograph 2**

Maint. & Paint Shop

**Area of Concern:**

1. Violation of CWA
2. Requires NPDES permit
3. Discharge of Hazardous waste into reported storm drain



Photograph 3

Maint. & Paint Storage Area

**Area of concern:**

1. Violation of RCRA and CWA
2. NPDES permit required
3. Discharge of Hazardous Material into reported storm drain



Photograph 4

Used Oil Storage Area

**Area of Concern:**

1. Violation of RCRA
2. Soil contamination
3. Requires spill contingency plan
4. Housekeeping



Photograph 5

Lock and Dam

**Area of Concern:**

1. Violation of CWA
2. Spill prevention plan
3. Contamination of project waters

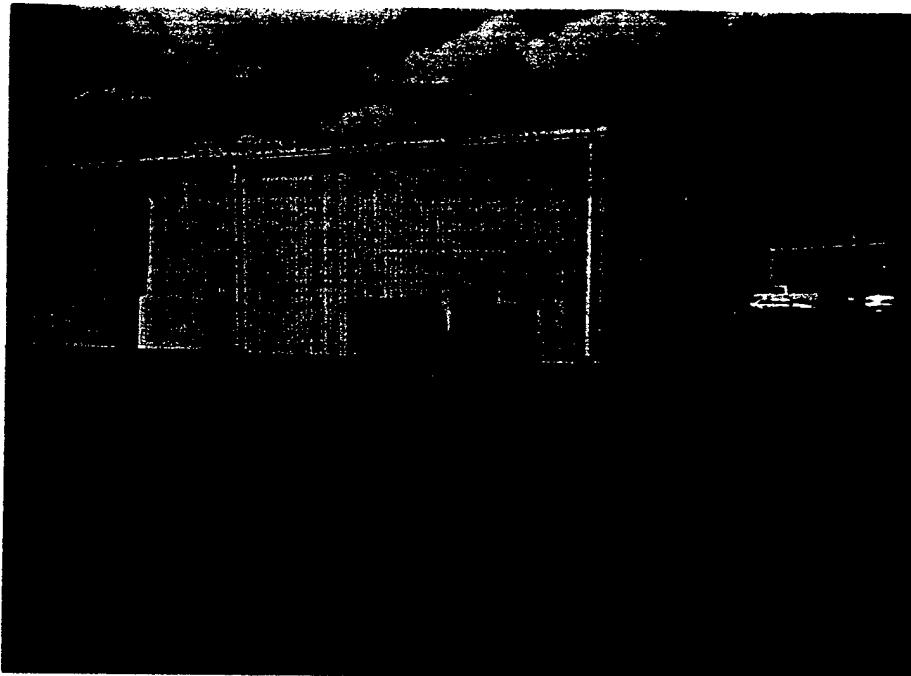


Photograph 6

Hydropower Plant Transformers

**Area of Concern:**

1. Violation of CWA and CERCLA
2. Soil contamination
3. Discharge of Hazardous materials (possible PCB)

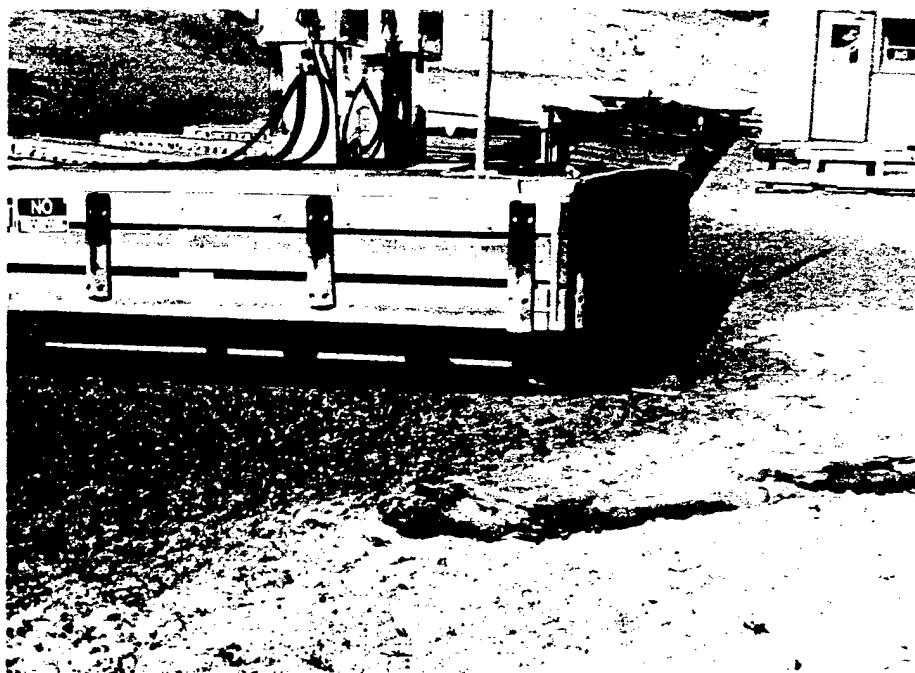


Photograph 7

Diesel Oil Storage Tanks

**Area of Concern:**

1. Soil contamination
2. Location of storm drain requires spill contingency plan

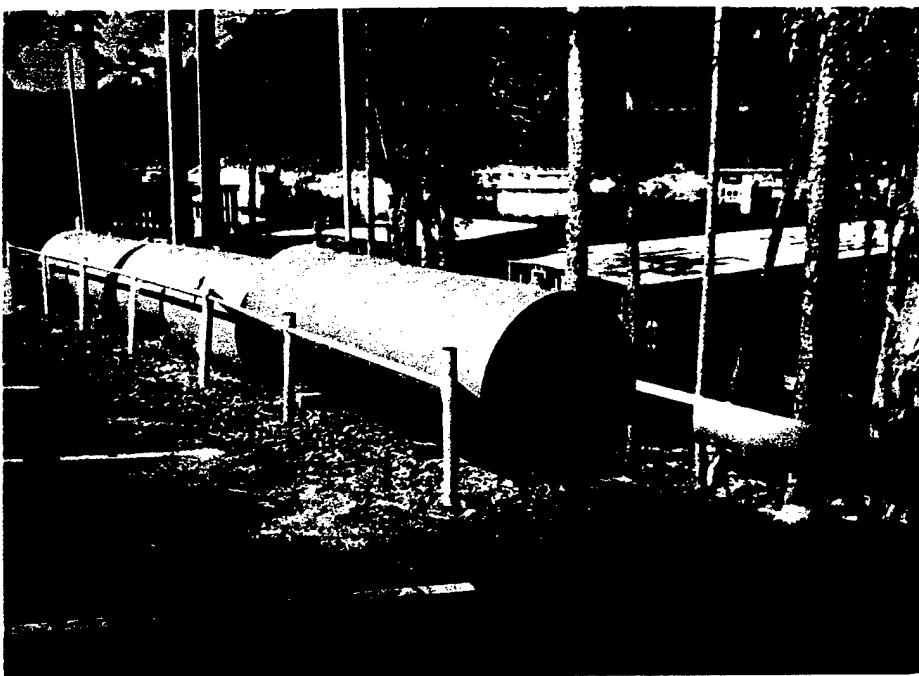


Photograph 8

Gasoline Dispensers in a Marina.

**Area of Concern:**

1. Violation of CWA
2. Contamination of project waters
3. Lack of environmental compliance/enforcement on real estate lease



Photograph 9

Fuel Storage Area in Marina.

**Area of Concern:**

1. Violation of CWA
2. Requires spill contingency plan
3. Lack of environmental compliance/enforcement on real estate lease



Photograph 10

Dispensing Area

**Area of Concern:**

1. Soil contamination
2. Spill contingency plan
3. Housekeeping

Photograph 11

Solid Waste Disposal site

**Area of Concern:**

1. Violation of solid waste disposal regulations
2. Creosote timbers: Violation of CERCLA
3. Potential NPL site



Photograph 12

Used Drums & Metal Storage Area

**Area of Concern:**

1. Violation of RCRA and solid waste regulations
2. Soil contamination
3. Improper storage of HTW
4. Lease enforcement

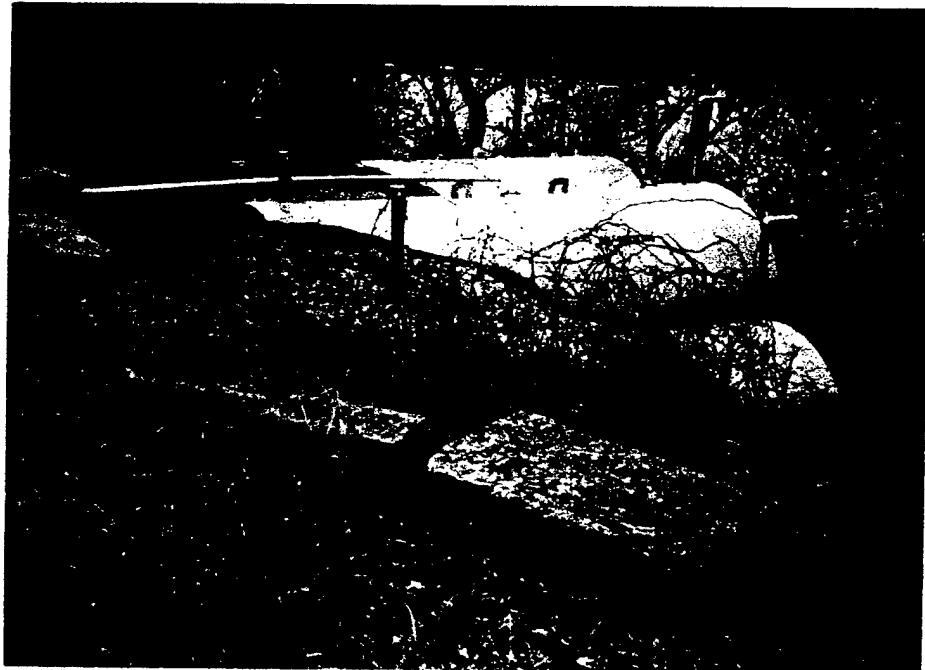


Photograph 13

Storage/Wash and Fuel Transfer Site

**Area of Concern:**

1. Violation of RCRA and CERCLA
2. Soil contamination
3. Requires spill contingency plan
4. Improper storage of hazardous materials
5. Housekeeping



Photograph 14

Fuel Storage Area

**Areas of Concern:**

1. Violation of RCRA and CWA
2. Requires spill contingency plan
3. Underground fuel storage tank requirements



Photograph 15

Batteries Storage Area

Area of concern:

1. Violation of CWA, CERCLA

2. Contamination of Project Waters

3. Lease enforcement



Photograph 16

Contractor's Storage Tank

Area of Concern:

1. Violation of CWA

2. Soil contamination

3. Enforcement of Contract Requirements for Environmental Compliance.

4. Spill contingency plan

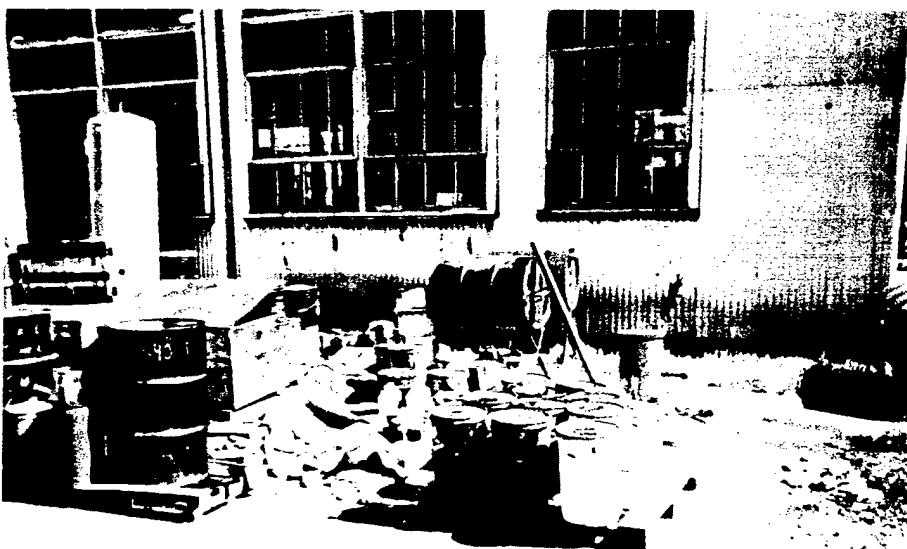


Photograph 17

Oil Rights  
Outgrant

**Area of Concern:**

1. Violation of RCRA, CWA
2. Soil Contamination
3. Lease enforcement
4. Spill contingency plan



Photograph 18

Oil, Paint Storage Area

**Area of Concern:**

1. Violation of RCRA
2. Improper storage of HTW
3. Soil contamination
4. Housekeeping
5. Spill contingency plan

Photograph 19

Paint, Oil Storage Area

**Area of Concern:**

- 1. Violation of RCRA, CERCLA**
- 2. Soil contamination**
- 3. Improper storage/disposal of HTW**
- 4. Housekeeping**
- 5. Spill contingency plan**

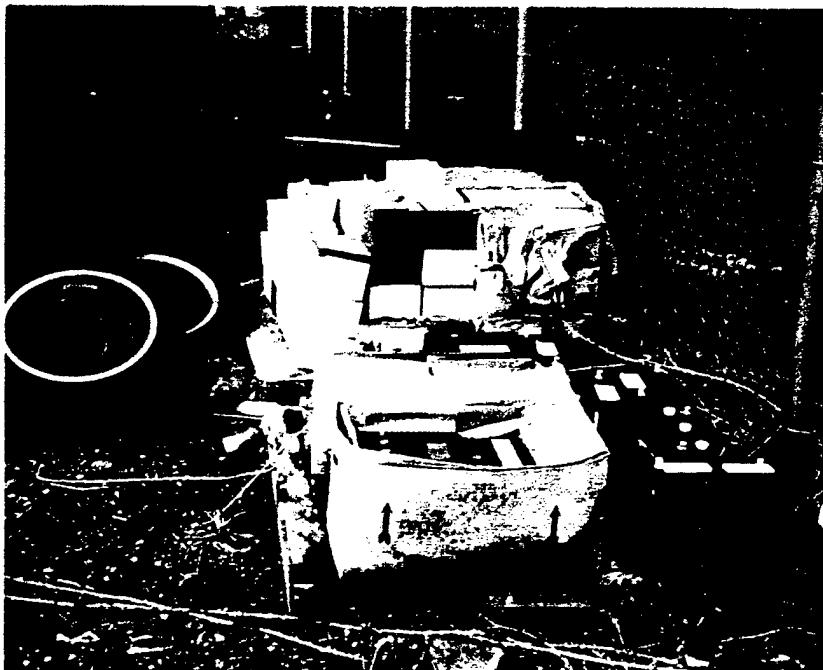


Photograph 20

Batteries Storage Area

**Area of Concern:**

- 1. Violation of RCRA, CERCLA**
- 2. Improper storage/disposal of HTW**
- 3. Spill contingency plan**





Photograph 21

Fuel Tanks

Area of Concern:

1. Violation of RCRA
2. Spill contingency



Photograph 22

Contractor's Fuel Dispensing Area

Area of Concern:

1. Soil contamination
2. Poor house-keeping
3. Spill contingency plan

## **Appendix C**

## ENVIRONMENTAL COMPLIANCE

### ABBREVIATION LIST

CAA	-	Clean Air Act
CFR	-	Code of Federal Regulations
CO	-	Carbon Monoxide
CWA	-	Clean Water Act
DoD	-	Department of Defense
ECC	-	Environmental Compliance Coordinator
EPA	-	Environmental Protection Agency
ECAS	-	Environmental Compliance Assessment System
ERGO	-	Environmental Review Guide for Operations
FIFRA	-	Federal Insecticide, Fungicide, and Rodenticide Act
FWS	-	U.S. Fish and Wildlife Service
MP	-	Management Practice
MSDS	-	Material Safety Data Sheet
NAAQS	-	National Ambient Air Quality Standards
NEPA	-	National Environmental Policy Act
NFPA	-	National Fire Protection Act
NHCar	-	New Hampshire Code of Administrative Regulations
NHPA	-	National Historic Preservation Act
NHRM	-	Natural and Historic Resources Management
NO <sup>x</sup>	-	Nitrogen Oxides
NPDES	-	National Pollutant Discharge Elimination System
NRM	-	Natural Resources Management
OHSPC	-	Oil and Hazardous Substances Pollution Contingency Plan
OMP	-	Operational Management Plan
PCB's	-	Polychlorinated Biphenyls
pCi/L	-	picoCurie per Liter
PMP	-	Pest Management Plan
POL	-	Petroleum Based Fuel or Lubricant
PPM	-	Parts Per Million
RCRA	-	Resource Conservation and Recovery Act
SARA	-	Superfund Amendments and Reauthorization Act of 1986
SDWA	-	Safe Drinking Water Act
SHPO	-	State Historic Preservation Officer
SPCC	-	Spill Prevention Control and Countermeasures
TCLP	-	Toxic Constituent Leaching Procedure
TSCA	-	Toxic Substances Control Act
TSDF	-	Treatment, Storage, and Disposal Facility
UFO	-	Unidentified Flying Object
USACE	-	U. S. Army Corps of Engineers
UST	-	Underground Storage Tanks
VOC	-	Volatile Organic Compound

## **Appendix D**



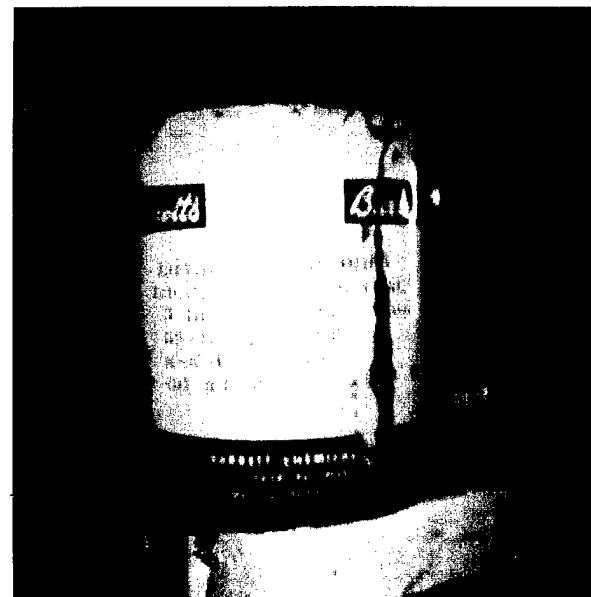
Photograph 1



Photograph 2



Photograph 3



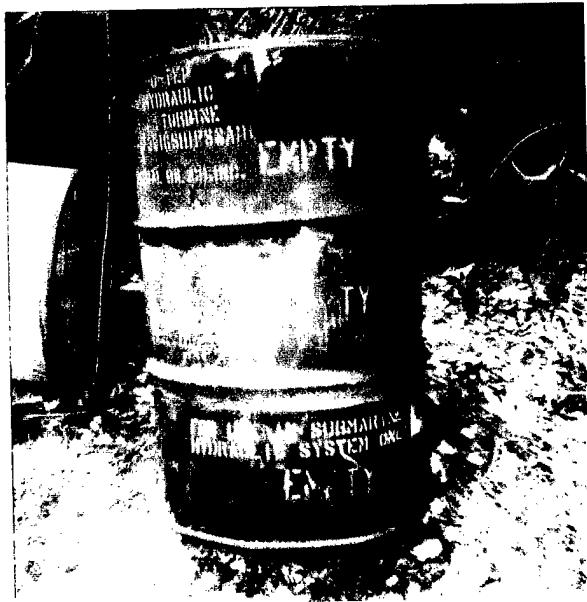
Photograph 4



Photograph 5



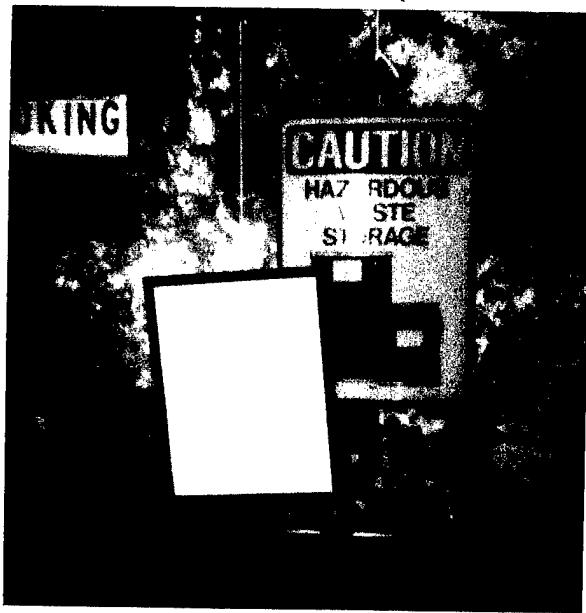
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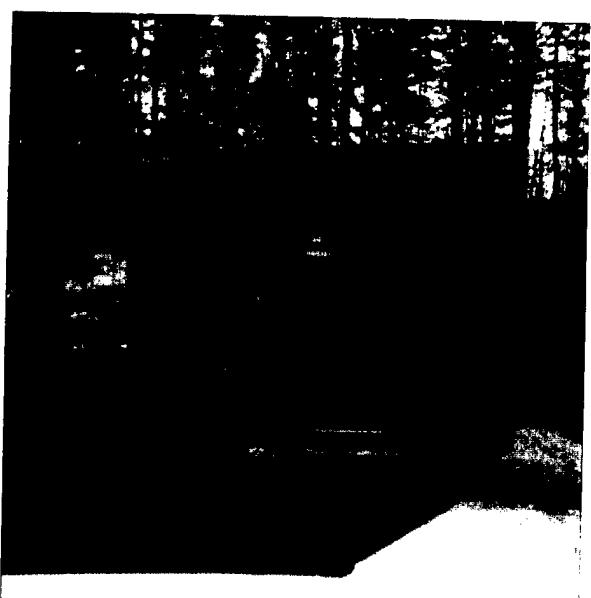
Photograph 7



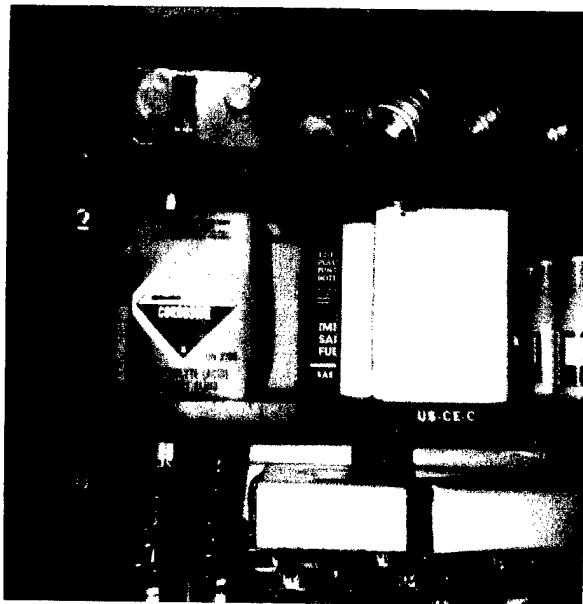
Photograph 8



Photograph 9



Photograph 10



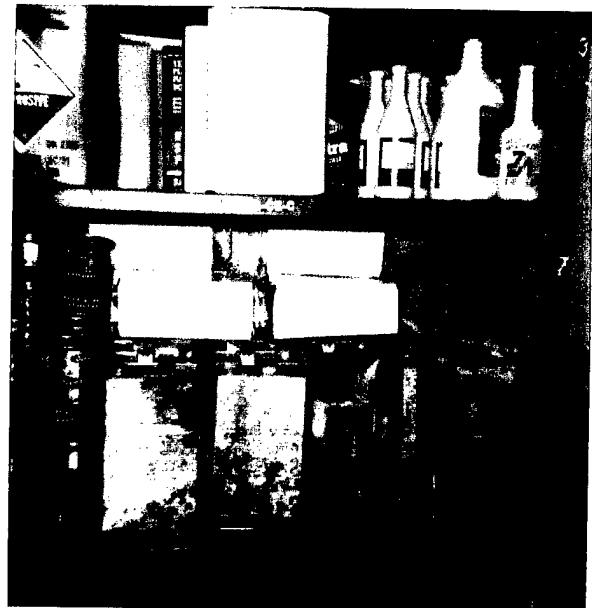
Photograph 11



Photograph 12



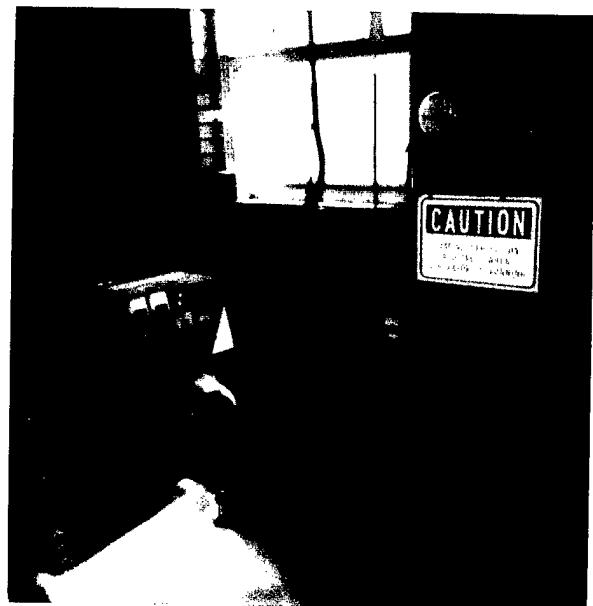
Photograph 13



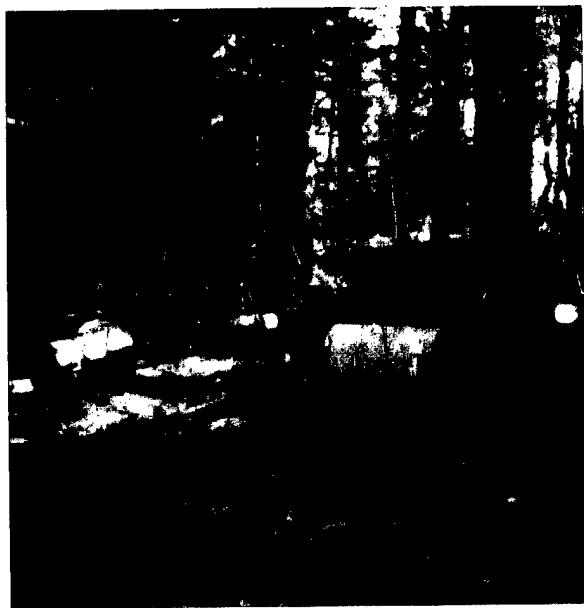
Photograph 14



Photograph 15



Photograph 16



Photograph 17



Photograph 18



Photograph 19



Photograph 20



Photograph 21



Photograph 22



Photograph 23



Photograph 24



Photograph 25



Photograph 26



Photograph 27



Photograph 28



Photograph 29



Photograph 31



Photograph 32



Photograph 33



Photograph 34

## **Appendix E**

REF. TO SECTION 3 # 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

July 20, 1987

Gerald Bartlett  
U.S. Army Corps of Engineering N.E.D.  
RFD #2, Tully Lake  
Athol, MA 01331-9806

RE: Verification of EPA I.D. Number

Dear Mr. Bartlett:

This letter is a written acknowledgement of the receipt of your Notification of Hazardous Waste Activity Form and the assigning of EPA I.D. Number (MA2960009817) to the above company at the above location. This letter is to serve in lieu of EPA Form 8700-12B(4-80) Acknowledgement of Notification of Hazardous Waste Activity (Verification). Please reference your EPA I.D. Number on all correspondence with the MA Department of Environmental Quality Engineering (DEQE) and EPA. If you have any questions regarding this acknowledgement, please contact Scott Hurd of the EPA at (617) 223-1356.

Sincerely,

*Scott A. Hurd*

*for* Tanya R. Sweeney, Chemical Engineer  
MA Waste Regulation Section

cc: Scott Hurd - EPA  
Anne Crawley - DEQE

SECTION 9 # 10

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING  
DIVISION OF HAZARDOUS WASTE  
One Winter Street  
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator US EPA ID No. <b>MA1296000981700001</b>	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address <b>U.S. Army Corps of Engineers Tully Lake Dam, Route #32 R.F.D. #2, Athol, MA 01331</b>								
4. Generator's Phone ( ) 5. Transporter 1 Company Name <b>Clean Harbors of Kingston, Inc.</b> 6. US EPA ID Number <b>MA1039322250</b>								
7. Transporter 2 Company Name 8. US EPA ID Number <span style="background-color: #cccccc;"> </span>								
9. Designated Facility Name and Site Address <b>Clean Harbors of Braintree, Inc. 395 Quincy Ave. Braintree, MA 02184</b> 10. US EPA ID Number <b>MA10513452617</b>								
GENERATOR	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol			
	<b>a. Spent Rd. asbestos, CBR-C, MA99</b>		<b>001</b>	<b>D</b>	<b>00055</b>			
	<b>b.</b>		<b>001</b>	<b>D</b>	<b>00055</b>			
	<b>c.</b>		<b>001</b>	<b>D</b>	<b>00055</b>			
	<b>d.</b>		<b>001</b>	<b>D</b>	<b>00055</b>			
TRANSPORTER	15. Special Handling Instructions and Additional Information <i>In case of spill contact 800-437-1244</i>							
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.							
	If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
	Printed/Typed Name <b>Gerald W BARTLOTT</b>		Signature		Month	Day	Year	
							Date	
17. Transporter 1 Acknowledgement of Receipt of Materials						Month	Day	Year
Printed/Typed Name <b>WILLIAM T. LEE</b>		Signature		Month	Day	Year		
						Date		
18. Transporter 2 Acknowledgement of Receipt of Materials						Month	Day	Year
Printed/Typed Name <b> </b>		Signature		Month	Day	Year		
						Date		
19. Discrepancy Indication Space						Month	Day	Year
						Month	Day	Year
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Month	Day	Year
Printed/Typed Name <b> </b>		Signature		Month	Day	Year		
						Date		

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Hazardous Waste MANIFEST SECTION, State Office Building, Hartford, CT 06106



24426

7795

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>M-A-P-0000081730000-1</b>	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but may be required by State law.
3. Generator's Name and Mailing Address <b>U.S. Army Corps Of Engineers MED</b> <b>Tally Lake Dam RFD # 2</b> <b>Athol, Mass 01331 9806</b>		617 249 9150		A. State Manifest Document Number <b>CT A 0058076</b>	
4. Generator's Phone		6. US EPA ID Number <b>M.T.D.0.0.0.0.8.200.3.6.5</b>		B. State Gen. ID <b>MSAME</b>	
5. Transporter 1 Company Name <b>Maine Waters Pollution Control</b>		8. US EPA ID Number <b>.....</b>		C. State Tran. ID <b>74340-ME</b>	
7. Transporter 2 Company Name				D. Tran. Phone <b>414-247-1100</b>	
9. Designated Facility Name and Site Address <b>EWR, Inc Environmental Waste Resources</b> <b>130 Freight St., Waterbury, CT 06702</b>		10. US EPA ID Number <b>C.T.D.0.7.2.1.3.8.9.6.9</b>		E. State Tran. ID <b>.....</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	
a. *	Waste Flammable Solvents, m.o.s. Flammable Liquids	<b>HM1993</b>	<b>0.01 TT</b>	<b>0.055 G</b>	
b.					
c.					
d.					
J. Additional Description for Materials Listed Above					
a.	<i>ketones, aromatics</i>				
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information					
<b>Waste Stream # A07793</b> <b>RQ 100 lbs.</b> <b>ERG #26</b>					
<i>"Unless I am a small quantity generator who has been exempted by Section 3002(b) of RCRA, I also declare that it is impractical for me to reduce the volume and toxicity of waste so as to make it feasible to transport, store, treat, or dispose currently practicable and I have selected the method of transport, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment."</i>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable state laws and regulations.					
Printed/Typed Name <b>Donald W Bartlett</b>		Signature <b>Donald W Bartlett</b>		Date Month Day Year <b>6 24 86</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name <b>Donald F. Gavin</b>		Signature <b>Donald F. Gavin</b>		Date Month Day Year <b>6 24 86</b>	
18. Transporter 2 Acknowledgement or Receipt of Materials					
Printed/Typed Name		Signature		Date Month Day Year .....	
19. Discrepancy Indication Space					
F A T Y					
T Y Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name <b>Jerry Palhow</b>		Signature <b>Jerry Palhow</b>		Date Month Day Year <b>0 6 25 86</b>	

# DISPOSITION FORM

For use of this form, see AR 340-15; the proponent agency is TAGO.

REFERENCE OR OFFICE SYMBOL	SUBJECT
CENED-OD-PL (200-1c)	Hazardous Materials (Herbicides) stored at Tully Lake, MA.

TO	FROM	DATE	CMT 1
Chief, Project Operations Branch	Park Ranger LCRB	20 March 89 Williams	

1. The following hazardous materials (Herbicides are currently being stored at Tully Lake. The following list contains trade names, chemical formulas, EPA registration numbers and quantity and condition of each container.

Silvex (2 4 5-T) 4 gallons (In one gallon containers).

Trichlorophenoxy propionic acid

Isooctyl Ester of Silvex

EPA Reg. #148-479    EPA Est. #148-KS-1

3 gallon containers are leaking.

Thompson Hayward Chemical Company, Kansas City, KA

Ded-Weed LV9 (2 4 5-T) 5 gallons (5 gallon container).

2-4-5 Trichlorophex

USDA # 148-431 Mfg. 4-68 pre EPA manufactured.

Thompson Hayward Chemical Company, Kansas City, KA

Weed-Done (2 4 5-T & 2 4 5-D) 5 gallons (5 gallon container).

Amchem Products, Inc., Fremont CA and Amber, PA.

pre EPA manufactured    No EPA #

Dow Formula 40 (2 4 5-D) 5 gallons (5 gallon container).

Akanolamine Salts of the ethanonal & isopropanol series &

of 2 4-Dichlorophenoxy acetic acid

EPA Reg. #464-1-AA    EPA Est. #464-M1-1    Lot MM

Dow Chemical.    No address given.

2. These herbicides are stored in the original containers. All original containers have been set inside of 2 plastic-lined 55 gallon drums.

3. We have arranged for disposal of all other non-hazardous waste materials stored at Tully Lake with New England Industrial Waste, Inc.



R. Bruce Williams  
Park Ranger, LCRB

cc:LCRB files  
Tully Lake

REF. TO SECTION 4 # 1.b



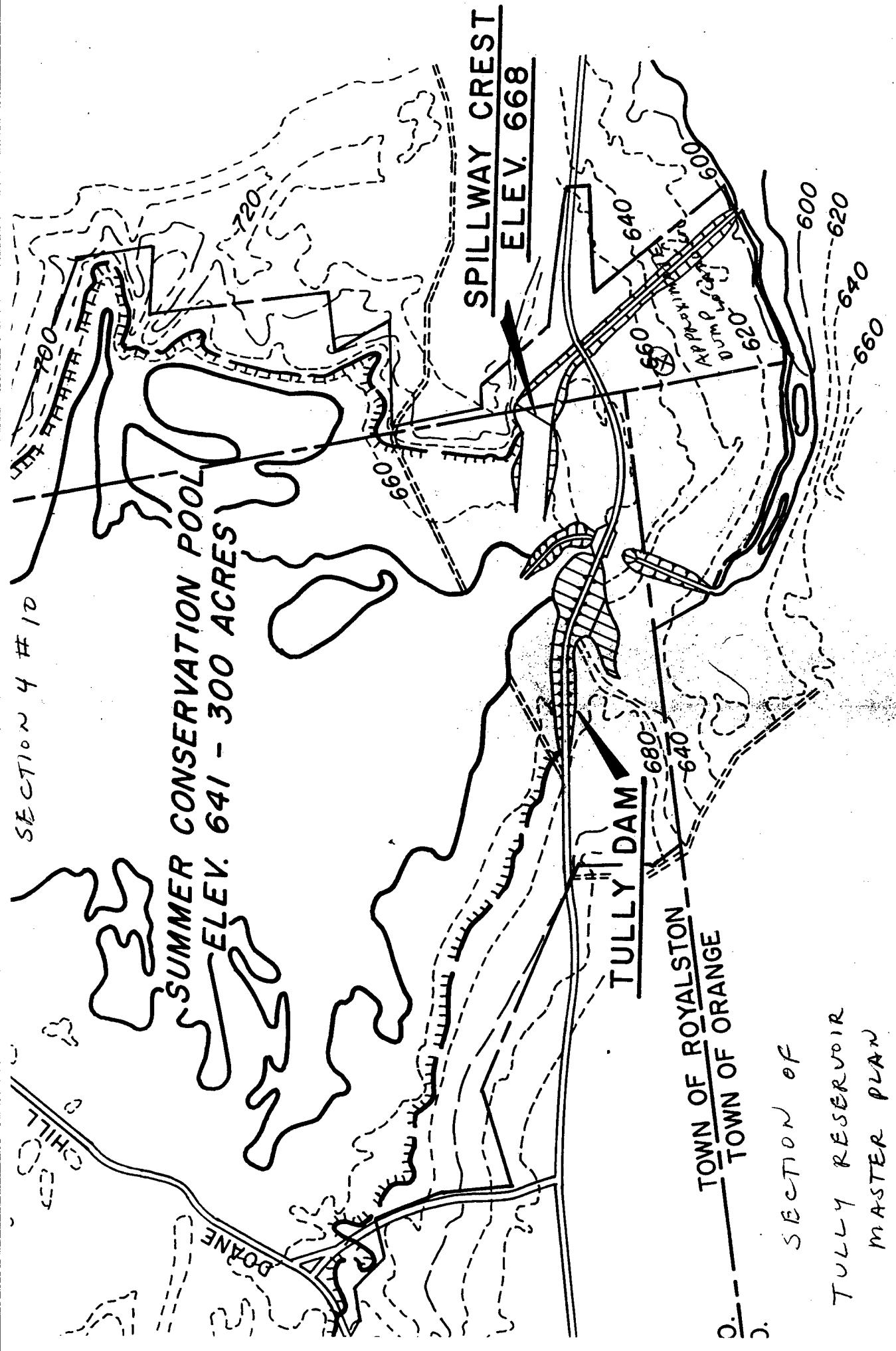
TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

PO# DAC W 3389 m 1030

Form approved. OMB No. 2050-0039, expires 09-30-91

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of /	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address		U.S. Army Corps of Engineers, NEC RFD #2, Tully Lake Dam Athol, MA 01420		A. State Manifest Document Number		R# 00093412	
4. Generator's Phone (508) 249-9150		6. US EPA ID Number		B. State Generator's ID		99925	
5. Transporter 1 Company Name		7. US EPA ID Number		C. State Transporter's ID		MA 656-130	
Clean Harbors of Natick, Inc		WAD 9-80523203		D. Transporter's Phone		508-655-5763	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID			
9. Designated Facility Name and Site Address		10. US EPA ID Number		F. Transporter's Phone			
Technical Environmental Systems, Inc 500 Battleground Road La Porte, Texas		TX D 9-82290140		G. State Facility's ID		HW-50225-001	
11A. HM		11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	Waste No.
		a. R.Q. Hazardous Waste Liquid, N.O.S (f027) ORM-E NA 9189		001 DM	00055 G	9189	
		b.					
		c.					
		d.					
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name		Signature		Month	Day	Year	
Gerald W Bartlett		Gerald W Bartlett		7	14	89	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name		Signature		Month	Day	Year	Date
Daniel R. Mahan		Daniel R. Mahan		07	14	89	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name		Signature		Month	Day	Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name		Signature		Month	Day	Year	Date



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
 NEW ENGLAND DIVISION, CORPS OF ENGINEERS  
 424 TRAPELO ROAD  
 WALTHAM, MASSACHUSETTS 02254-9149

CENED-CT-C

Date: 15 November 1991

## MEMORANDUM FOR

- |  |   |
|--|---|
| <input type="checkbox"/> Engineering Directorate, DB                   | <input type="checkbox"/> Division Counsel             |
| <input type="checkbox"/> Materials Laboratory                          | <input type="checkbox"/> Logistics Directorate        |
| <input type="checkbox"/> Construction Directorate                      | <input type="checkbox"/> Security and Law Enforcement |
| <input type="checkbox"/> Real Estate Directorate                       | <input type="checkbox"/> IMO, Mail & Records          |
| <input type="checkbox"/> Project Manager, Birch Hill Dam               | <input type="checkbox"/> Contract File                |
| <input checked="" type="checkbox"/> Operations Directorate             | <input type="checkbox"/> Files                        |
| <input checked="" type="checkbox"/> <u>Project Manager, Tully Lake</u> | <input type="checkbox"/> <u>Project Manager, LCRB</u> |
| <hr/>  |   |
| <input type="checkbox"/> Project Manager, N. Central Res. Office       |   |

PROJECT: Replace Fuel Tanks, Birch Hill Dam and Tully Lake, Athol, Massachusetts

SUBJECT: FINAL PAYMENT - Contract No. DACW33-90-C-0072

Huhtala Oil & Templeton Garage, Inc.  
 5 Main Street - Box 417  
 East Templeton, Massachusetts 01438-0417

Notification has been received from the Finance and Accounting Center that final payment under the subject contract has been processed and the contract is now officially closed. You are requested to proceed with disposition of your files related to this contract pursuant to AR 25-400-2.

Total Amount: \$83,537.50

FINAL PAYMENT MADE ON: November 5, 1991

*Charles W. Coe*  
 CHARLES W. COE  
 Director of Contracting *ERL*

SECTION 10 # 5,6

Tully Lake Dam  
Replacement fuel storage tank = Gate House

23 July 1991

Total Dept of Hole is 8.5 ft Below gate house step .

BOTTOM IS LINED WITH 1 FT OF PEA STONE.

Bottom of the tank is 7.5 ft below the gate house steps.

Top of the tank is 3 ft below the gate house steps.

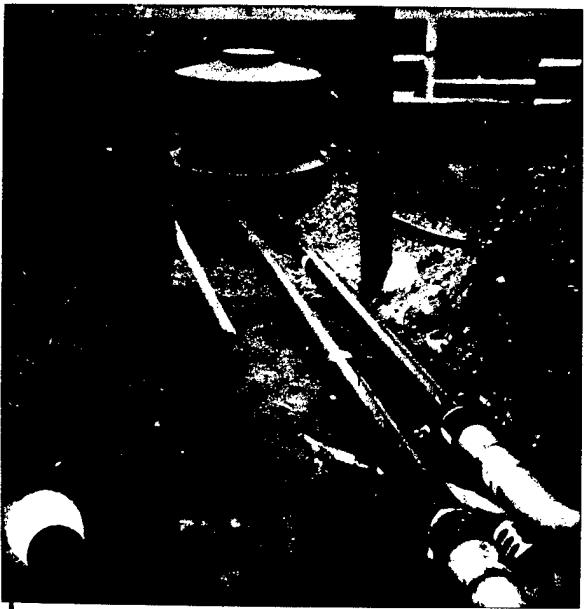
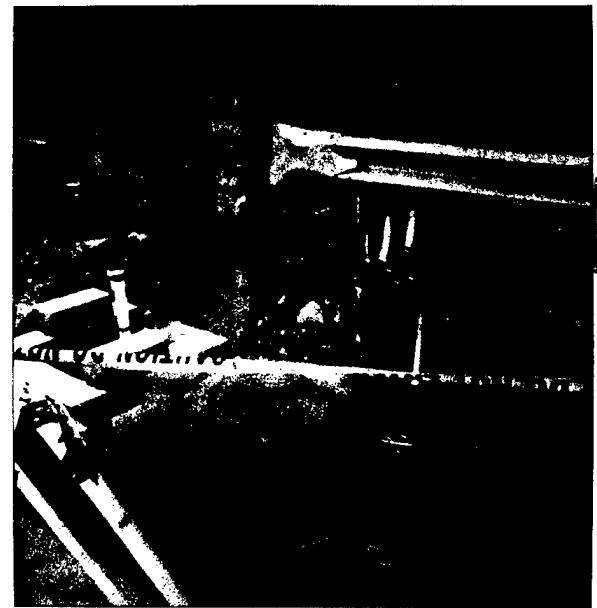
Diameter of tank is 52 inches with a 2 inch man hole rise.

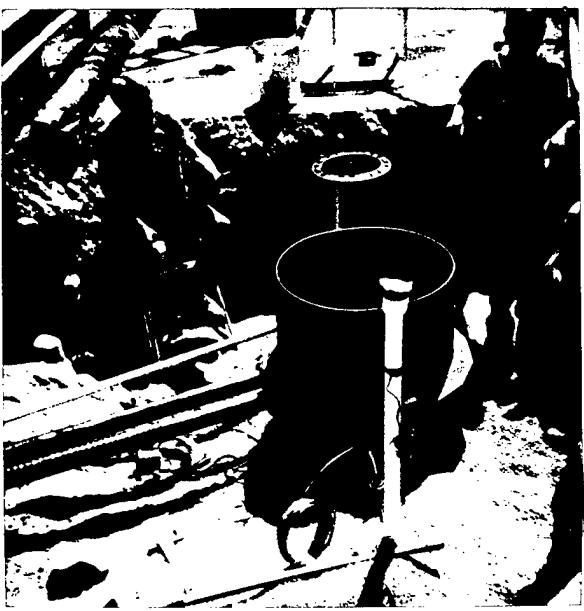
The tank is parralel with Route # 32

From the southerly center end of tank to the south west corner of the gate house is 10.3 ft.

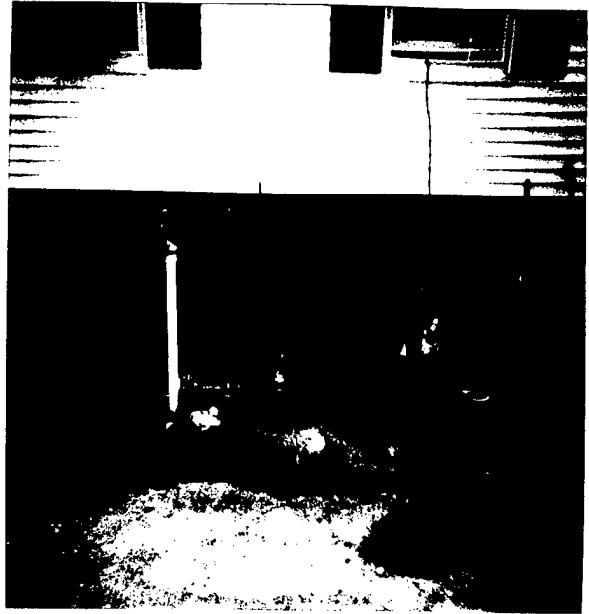
From the northerly center end of tank to the south west corner of gate is 6 ft.

Tank lenght is 6.2 ft.









PROJECT OFFICE

**TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES  
MANUFACTURER'S CERTIFICATES OF COMPLIANCE**

(Read instructions on the reverse side prior to initiating this form)

**FILE**

DATE **OCT 29 1990**  
**14/SCT/90**

NEW SUBMITTAL  
 SUBMITTAL

**Section I**

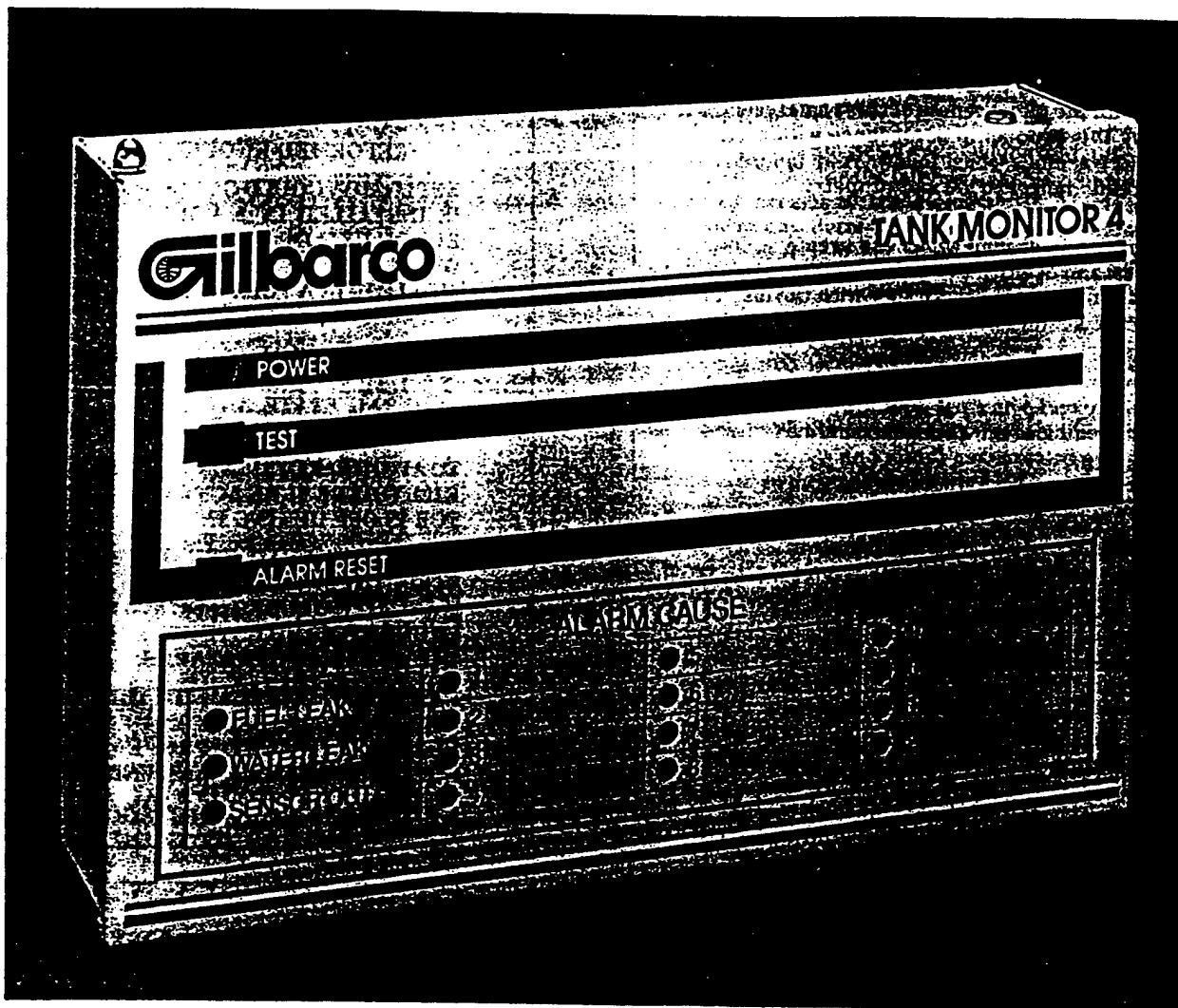
**REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS** (This section will be initiated by the contractor)

TO: Chief Design Branch	FROM: Huhtala O/I Co.	CONTRACT NO.	TRANSMITTAL NO.
U.S. Army Corps of Engineers	5 Main St.	DACW37-90-C-0072	2
424 Tammis Rd., Waltham Mass	E. Tammis Ln., Mn. 01438	PREVIOUS TRANS. NO. (if any)	
SPECIFICATION SEC. NO. (Cover only one section with each transmittal)	PROJECT TITLE AND LOCATION		
Fuel Tank Replacement, Bush Hill Dam, Tully Lake Dam			
DESCRIPTION OF ITEM SUBMITTED (Type, size, model number, etc.)		CONTRACT REFERENCE DOCUMENT	FOR C E USE CODE
ITEM NO.	MFG. OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction No. 8)	NO. OF COPIES	INSTRUCTION NO. 6 (See
a.	c.	b.	REFERENCE
b.	c.	d.	ITEM NO.
c.	c.	e.	15000-4.1
	c.	f.	15000-4.1
	c.	g.	15000-4.1
	c.	h.	15000-4.1
	c.	i.	15000-4.1
	c.	j.	15000-4.1
	c.	k.	15000-4.1
	c.	l.	15000-4.1
	c.	m.	15000-4.1
	c.	n.	15000-4.1
	c.	o.	15000-4.1
	c.	p.	15000-4.1
	c.	q.	15000-4.1
	c.	r.	15000-4.1
	c.	s.	15000-4.1
	c.	t.	15000-4.1
	c.	u.	15000-4.1
	c.	v.	15000-4.1
	c.	w.	15000-4.1
	c.	x.	15000-4.1
	c.	y.	15000-4.1
	c.	z.	15000-4.1
	c.	aa.	15000-4.1
	c.	bb.	15000-4.1
	c.	cc.	15000-4.1
	c.	dd.	15000-4.1
	c.	ee.	15000-4.1
	c.	ff.	15000-4.1
	c.	gg.	15000-4.1
	c.	hh.	15000-4.1
	c.	ii.	15000-4.1
	c.	jj.	15000-4.1
	c.	kk.	15000-4.1
	c.	ll.	15000-4.1
	c.	mm.	15000-4.1
	c.	nn.	15000-4.1
	c.	oo.	15000-4.1
	c.	pp.	15000-4.1
	c.	qq.	15000-4.1
	c.	rr.	15000-4.1
	c.	ss.	15000-4.1
	c.	tt.	15000-4.1
	c.	uu.	15000-4.1
	c.	vv.	15000-4.1
	c.	ww.	15000-4.1
	c.	xx.	15000-4.1
	c.	yy.	15000-4.1
	c.	zz.	15000-4.1
	c.	aa.	15000-4.1
	c.	bb.	15000-4.1
	c.	cc.	15000-4.1
	c.	dd.	15000-4.1
	c.	ee.	15000-4.1
	c.	ff.	15000-4.1
	c.	gg.	15000-4.1
	c.	hh.	15000-4.1
	c.	ii.	15000-4.1
	c.	jj.	15000-4.1
	c.	kk.	15000-4.1
	c.	ll.	15000-4.1
	c.	mm.	15000-4.1
	c.	nn.	15000-4.1
	c.	oo.	15000-4.1
	c.	pp.	15000-4.1
	c.	qq.	15000-4.1
	c.	rr.	15000-4.1
	c.	ss.	15000-4.1
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	c.	uu.	15000-4.1
	c.	vv.	15000-4.1
	c.	ww.	15000-4.1
	c.	xx.	15000-4.1
	c.	yy.	15000-4.1
	c.	zz.	15000-4.1
	c.	aa.	15000-4.1
	c.	bb.	15000-4.1
	c.	cc.	15000-4.1
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	c.	ff.	15000-4.1
	c.	gg.	15000-4.1
	c.	hh.	15000-4.1
	c.	ii.	15000-4.1
	c.	jj.	15000-4.1
	c.	kk.	15000-4.1
	c.	ll.	15000-4.1
	c.	mm.	15000-4.1
	c.	nn.	15000-4.1
	c.	oo.	15000-4.1
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# SITE PREPARATION AND INSTALLATION INSTRUCTIONS

VERSION 1  
TANK MONITOR 4

## TANK MONITOR 4



<input checked="" type="checkbox"/>	A	Approved	D	Will be returned by separate correspondence
B	Approved, except as noted Resubmission not required		E	Dis-approved. See attached sheet
C	Approved, samples tested Resubmission required		F	Approval action not required

Gilbarco Inc. CORPS OF ENGINEERS, NEW ENGLAND DIVISION  
SHE-KED BY: DATE: OCT 23 1990

7300 W. Friendly Ave.

Greensboro, NC 27420

1 MARCH 89

NOTE FOR CONTRACTOR - IMPORTANT!  
DIMENSIONS AND QUANTITIES HAVE NOT BEEN CHECKED.  
SEE PARAGRAPH "SUGGESTIONS" OF THE SPECIFICATIONS AS TO LIMITATIONS OF THIS APPROVAL AND RESPONSIBILITY OF THE CONTRACTOR.

# Site Preparation and Installation Manual

## Tank Monitor 4

### SECTION 2. SITE PREPARATION

**WARNING: IN INSTALLATION OF THIS PRODUCT, COMPLY WITH THE NATIONAL ELECTRICAL CODE; FEDERAL, STATE, AND LOCAL CODES; AND OTHER APPLICABLE SAFETY CODES.**

**WARNING: TO PROTECT YOURSELF AND OTHERS FROM BEING STRUCK BY VEHICLES DURING WORK, BLOCK OFF YOUR WORK AREA DURING INSTALLATION OR SERVICE.**

**FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.**

#### A. SENSOR RISER PIPE INSTALLATION. (See Figures 1 and 2 for dimensions and installation requirements.)

Note: If the tank is at a tilt, install the sensor in the low end of the tank.

1. Standard Procedures for installing a fill pipe can be used. Instructions are based on a 2-inch riser pipe.
2. If the tank is buried, excavate the portion that contains the bungs available to accept a riser pipe.
3. Remove the plug from the hole. Then, install the riser pipe in the hole. The top of the riser must either have a 2-inch -14 NPT pipe thread or accept a standard Schedule 40 2-inch - 14 NPT male adapter ring (as supplied in Gilbarco Kit No. Q12312-01). Ensure that there is enough clearance between the top of the riser and the manhole cover to allow room for the 2-wire cable supplied with the sensor.

Note: Gilbarco Riser Cap Kit No. Q12312-01 can be used with either threaded or unthreaded riser pipes.

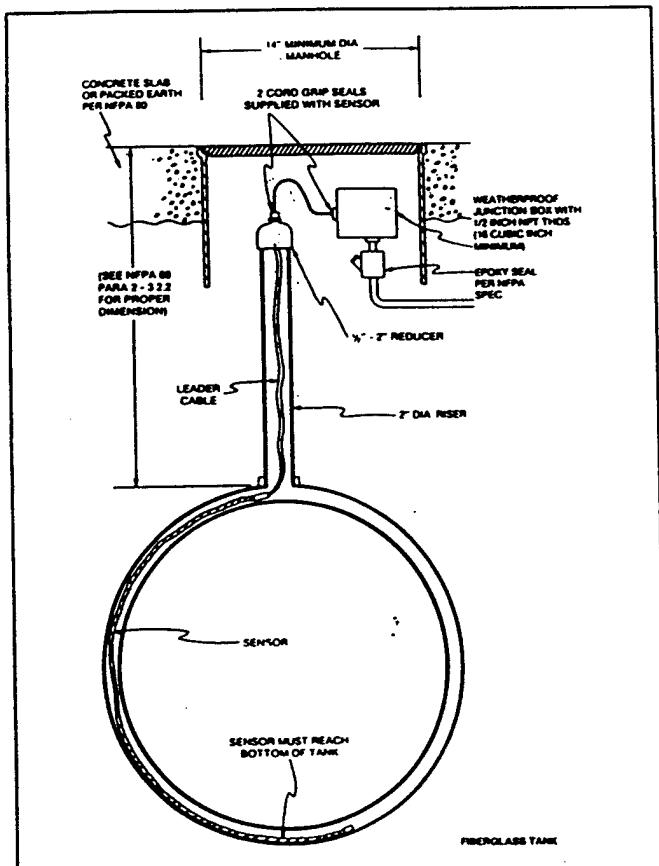


Figure 1. Sensor Dimensions and Installation Requirements  
— Fiberglass Tank

4. Install a standard adapter ring and/or pipe cap on the riser pipe.

Note: If the threaded adapter ring is used, install with proper adhesive (i.e., TBC cement). Use thread sealer, NOT ADHESIVE, when installing the riser cap.

#### B. MONITOR LOCATION SELECTION.

**WARNING: IMPROPER SYSTEM OPERATION COULD RESULT IN UNDETECTED POTENTIAL ENVIRONMENTAL AND HEALTH HAZARDS IF SENSOR-TO-MONITOR WIRE RUNS EXCEED 1,000 FEET. RUNS OVER 1,000 FEET ARE NOT UL APPROVED FOR THIS APPLICATION. SENSOR-TO-MONITOR WIRE MUST NOT EXCEED 1,000 FEET.**

**WARNING: EXPLOSION COULD OCCUR IF THE MONITOR IS INSTALLED IN A VOLATILE, COMBUSTIBLE OR EXPLOSIVE (CLASS I, DIVISION I OR DIVISION II) ATMOSPHERE. DO NOT INSTALL MONITOR IN A VOLATILE, COMBUSTIBLE OR EXPLOSIVE ATMOSPHERE.**

**FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.**

1. Select a mounting location on the inside wall of an enclosed building. Be sure the monitor will be protected from severe vibration, extremes in temperature and humidity, rain, and other conditions which could harm the equipment. In addition, consider the ease of routing interconnection conduit and power conduit when selecting location for mounting the monitor.

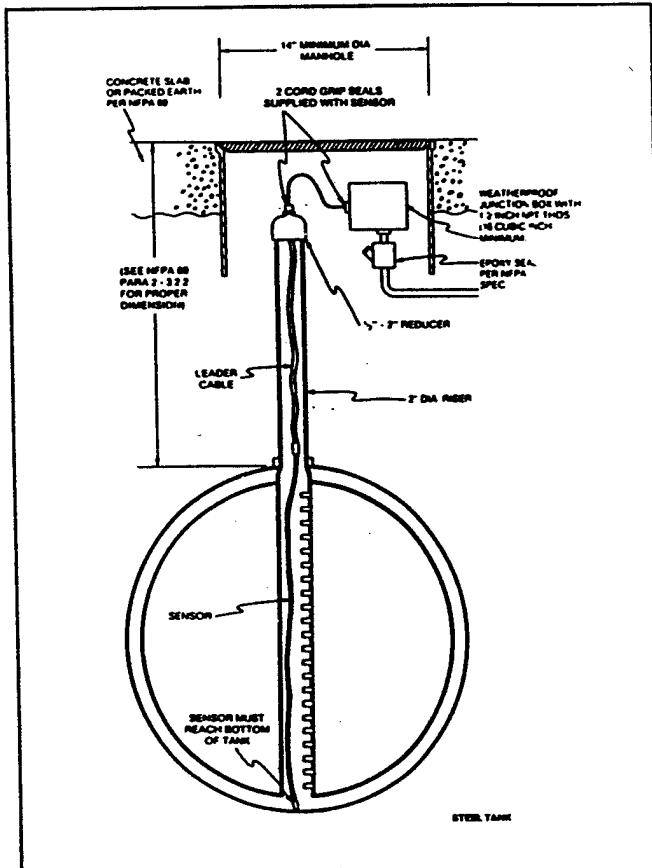


Figure 2. Sensor Dimensions and Installation Requirements  
— Steel Tank

### **C. INSIDE CONDUIT INSTALLATION.**

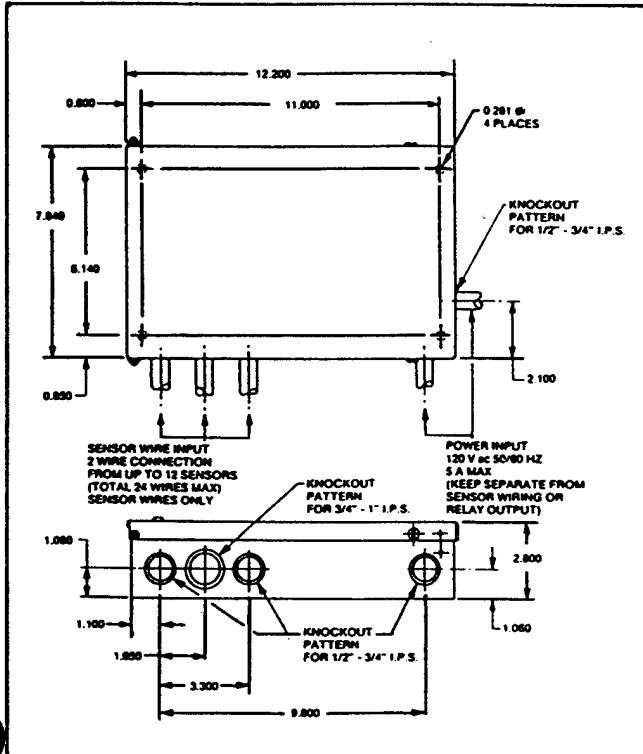
1. Install 1/2-inch rigid metal conduit or raceway for monitor power from the power panel to the monitor location. Conduit must align with the designated power knockout as shown in Figure 3. Power wiring must be installed in a separate conduit from sensor wiring.
2. Install a junction box to accommodate the sensor wiring as shown in Figure 4.
3. Run rigid metal conduit for sensor wiring from the monitor to the sensor wiring junction box as shown in Figure 4. Conduit must enter the monitor *where knockouts are provided*. No other conduit entry is permitted. Always keep sensor wires in a separate conduit or trough from all other wiring.

**WARNING: EXPLOSION COULD OCCUR IF OTHER WIRES SHARE TANK MONITOR 4 SENSOR WIRE CONDUITS OR WIRING TROUGHS. CONDUITS AND WIRING TROUGHS FROM SENSORS TO THE MONITOR MUST NOT CONTAIN ANY OTHER WIRES.**

**WARNING: EXPLOSION AND/OR EQUIPMENT DAMAGE COULD OCCUR IF CONDUITS DO NOT ENTER THE MONITOR THROUGH THEIR DESIGNATED PRE-FORMED KNOCKOUTS.**

**FAILURE TO COMPLY WITH THESE WARNINGS COULD RESULT IN DEATH, SERIOUS PERSONAL INJURY, PROPERTY LOSS, AND EQUIPMENT DAMAGE.**

4. Wiring between the sensors and the monitor is designed such that electrical power to the sensor wires is limited so that there is insufficient energy present to ignite the fuel. To maintain this safety feature, sensor wires must be installed in separate conduits from all other wiring. Never run these wires in the same conduit or wiring trough as power wires.



**Figure 3. Monitor Dimensions and Installation Requirements**

### **D. SENSOR CONDUIT INSTALLATION. (See Figure 4, "Tank Monitor 4 Wiring Installation Diagram.")**

**WARNING: SENSOR-TO-MONITOR WIRE MUST NOT EXCEED 1,000 FEET. IMPROPER SYSTEM OPERATION COULD RESULT IN INACCURATE INVENTORY CONTROL OR UNDETECTED POTENTIAL ENVIRONMENTAL AND HEALTH HAZARDS IF SENSOR-TO-MONITOR WIRE RUNS EXCEED 1,000 FEET. RUNS OVER 1,000 FEET ARE NOT UL APPROVED FOR THIS APPLICATION.**

1. Dig trenches as necessary to install conduit from the monitor to each sensor location. Sensor wiring must enter the monitor through the knockouts located at the bottom left-hand side of the monitor case. (See Figure 3.)
2. Lay 1/2-inch rigid metal conduit from each sensor junction box to the sensor junction box or wiring trough located inside the building.

**WARNING: EXPLOSION COULD OCCUR IF OTHER WIRES SHARE TANK MONITOR 4 SENSOR WIRE CONDUITS OR WIRING TROUGHS. CONDUITS AND WIRING TROUGHS FROM SENSORS TO THE MONITOR MUST NOT CONTAIN ANY OTHER WIRES.**

Lay a single 3/4-inch rigid metal conduit from the junction box or wiring trough to the Tank Monitor 4 sensor location.

3. The conduit can enter the manhole through the bottom or the side, but the end of the conduit should be high enough to reduce the chance of water covering the junction box during heavy rain.
4. Install 1/2-inch rigid metal conduit or raceway for monitor power from the power panel to the monitor location. Conduit must align with the designated power knockout as shown in Figure 3. Power wiring must be installed in a separate conduit from sensor wiring.

### **E. SENSOR JUNCTION BOX INSTALLATION. (See Figures 1 and 2.)**

Install a weatherproof electrical junction box with gasketed cover on the end of each conduit run at the sensor locations. Gasketing or sealing compound must be used at each entry to the junction box to ensure a waterproof junction. The interior of the junction box must be a minimum of 16 cubic inches. Use one of the following approved units or equivalent:

**Manufacturer:** Appleton Electric Co.  
1701 W. Wellington Av.  
Chicago, IL 60657

**Phone:** (312) 327-7200

Description	Part No.	Qty.
Junction Box	JBDX-75	1
Cover, Junction Box	JBK-B	1
Gasket, Junction Box	JB-GK-V	1

**Manufacturer:** Crouse-Hinds Co.  
Syracuse, NY 13221

**Phone:** (315) 477-7000

Description	Part No.	Qty.
Junction Box	GRFX-139	1
Cover, Junction Box	GRF-10	1
Gasket, Junction Box	GASK-643	1

## SECTION 10 # 556

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE <small>(Read Instructions on the reverse side prior to initiating this form)</small>		DATE	<input checked="" type="checkbox"/> NEW SUBMITTAL <input type="checkbox"/> RESUBMITTAL
REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)		31 July 90	
TO: U.S. Army Corps of Engineers Tully Lake Dam		FROM: Holt Talch Oil Company 5 Main St. East Tompkins, NY 14858	CONTRACT NO.
SPECIFICATION SEC. NO. (Cover only one section with each transmittal)		Item 33-90-C-0073	TRANSMITTAL NO. <i>J</i>
PROJECT TITLE AND LOCATION Terc Hatch Replacement, Birch Hill Dam, Tully Lake Dam		PREVIOUS TRANS. NO. <i>4/1/87</i>	PREVIOUS TRANS. NO. <i>4/1/87</i>
ITEM NO.	DESCRIPTION OF ITEM SUBMITTED (Type, size, model number, etc.)	MFG. OR CONTR. CAT., CURVE, DRAWING OR BROCHURE NO. (See Instruction No. 8)	FOR C E USE CODE INSTRUCTION NO. 6
a.	b.	c.	d.
5	Quality Control Representative	1 01400- <i>J</i>	e.
6	Quality Control Daily Report	1 01400- <i>J</i>	f.
7	Data Reporting	1 C1100- <i>S</i>	g.
8	Accident Prevention Plan	1 01500- <i>J</i>	h.
9	Demolition Procedures	1 03050- <i>J</i>	
REMARKS			
ENCLOSURES RETURNED (List by Item No.)		APPROVAL ACTION	
		NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY DATE	
		(Propon int. DAEN-EQC-Q) SHEET <u>1</u>	

I certify that the above submitted items have been reviewed in detail and are correct and in strict conformance with the contract drawings and specifications except as otherwise stated.

*J. A. Holt*

NAME AND SIGNATURE OF CONTRACTOR

Dope and Lacquer Thinner - CSD Inc. Conroe TX 77305

Trichloroethane - Northvale, NJ

Enamel Thinner - CSP Inc. Conroe TX 77305

Enamel Reducer - Imont Corp Detroit MI 48210

Turpentine - WM Barr & Co Memphis, TN 38113

Gear Oil - Mobile New York, New York

Motor Oil - Amalie Bradford, PA 16701

Ford Troy, Michigan 48084

Quaker State Corp. Oil City PA 16301

Sunoco Philadelphia PA 19103-1699

Transmission Fluid - Amoco Chicago Illinois

Sunoco Philadelphia PA 19103-1699

Amalie Bradford PA 16701

Silkscreen Chemicals - Metra Chem Corp  
792 Hartford Pike  
Shrewsbury MA 01545

Wax & Silicone Remover BASF Corp Dearborn MI 48124  
Grand Rapids MI 49509 Belvidere NJ 07823

• Erosal Cans Chemicals - United, Addison, IL 60101

Zep Atlanta Georgia 30301

Krylon, Borden Inc Columbus Ohio 43215

Sapolin, Brooklyn NY 11231

Jet, Neodesha, Kansas 66757

Flare, Bell Chemical Co. 411 North Wcott Ave  
Chicago Ill 60622

Instix - Instix Prod. Corp., 115 Wood worth Ave  
Yonkers NY

Antifreeze - The Old World Trading Co Inc.  
Des Plaines, IL 60016

Windshield Fluid - Penn Pride S.A.Y. Ind Inc.  
Leominster MASS 01453

TradCo Corp 1081 Rosemary Blvd  
Akron OH 44308

Boundary Paint - Nelson Paint Co., Iron Mountain Michigan 49801  
Montgomery, Alabama 36108                            McMinnville, Oregon 97128  
Southern Coatings Inc. Sumter South Carolina 29150  
Slidell, Louisiana 70459

Silkscreen Paint - Naz Dar, Chicago, Ill. 60622

Paint Oil Base - Sherwin Williams Co. Cleveland Ohio 44101  
Muralo Co. Inc. Bayonne New Jersey 07002  
Thermalox, Dampney Co Inc. 85 Paris St. Everett MA 02199  
GSA

Paint Latex - Duron Inc. Beltsville, MD 20705

Tru Test Chicago Ill 60614

Servisstar Butler Pennsylvania 16001

Aerosol Cans Paint - SrrayOn Products Inc. Bedford Heights Ohio 44146 & Anaheim California 92806

So Sure, LHB Industries Berkeley, MO 63134

Illinois Bronze Lake Zurich Illinois 60047

Ford Dearborn MI 48121

Glidden Cleveland, Ohio 44115

Super Supreme Traffic Paint, Fox Valley 122 South Northwest Highway Cary, IL 60013

Tempo Products Co Cleveland, Ohio 44139

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_

WORK AREA(ROOM) LOCK UP ROOM CODE \_\_\_\_\_

PRODUCT NAME TURTLE WAX NSN \_\_\_\_\_  
TURTLE WAX INC.

MANUFACTURER NAME CHICAGO, ILL. 60638

FORM: LIQUID SOLID GAS OTHER PASTE USE WAXING VEHICLES

USER ANYONE

QUANTITIES: LBS 6.01\* GAL /\* CUF /\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME DIESEL FUEL ANTI GEL NSN \_\_\_\_\_

MANUFACTURER NAME RADIATOR SPECIALTY CO.

FORM: LIQUID X SOLID GAS OTHER USE

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS /\*~58 GAL /\* CUF /\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME WAX STRIPPER NSN \_\_\_\_\_  
CROWN GROUP

MANUFACTURER NAME CULVER CITY, CA. 90230

FORM: LIQUID X SOLID GAS OTHER USE STRIP WAX BUILD UP

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS /\* GAL /\* CUF /\*

MSDS ON HAND? YES NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP ROOM CODE \_\_\_\_\_  
PROTECTIVE COATING ANDPRODUCT NAME BEAUTIFER Compound NSN 8030011032868MANUFACTURER NAME AEROFILL TECHNOLOGY INC  
225 INDUSTRIAL PARK DRIVE  
SULLIVAN MO 63080FORM: LIQUID  SOLID  GAS  OTHER  USE POLISHUSER AnyoneQUANTITIES: LBS /\* 27 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*PRODUCT NAME SCOURING POWDER NSN 7930-00-721-8592MANUFACTURER NAME FITZPATRICK BROS  
CHICAGO IL 60612FORM: LIQUID  SOLID  GAS  OTHER POWDER USE CLEANING

USER \_\_\_\_\_ CODE \_\_\_\_\_

QUANTITIES: LBS /\* 443 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*PRODUCT NAME 1 LIQUID NSN \_\_\_\_\_MANUFACTURER NAME SOUTHFIELD MI 48037FORM: LIQUID  SOLID  GAS  OTHER  USE POLISH PLASTICSUSER Anyone CODE \_\_\_\_\_QUANTITIES: LBS /\* 18 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_

WORK AREA(ROOM) LOCK UP ROOM CODE \_\_\_\_\_

PRODUCT NAME CAR WASH NSN \_\_\_\_\_  
RADIATOR SPECIALTY CO.

MANUFACTURER NAME CHARLOTTE, NC. 28284-6080

FORM: LIQUID SOLID GAS OTHER POWDER USE \_\_\_\_\_

USER ANYONE

QUANTITIES: LBS 1.0 / \* GAL 1 / \* CUF 1 / \*

MSDS ON HAND? YES 1 NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME WASP & HORNET KILLER NSN \_\_\_\_\_  
SHERWIN WILLIAMS

MANUFACTURER NAME BEDFORD HEIGHTS, OH 44146

FORM: LIQUID SOLID GAS OTHER SPRAY USE \_\_\_\_\_

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS 1 / \* .55 GAL 1 / \* CUF 1 / \*

MSDS ON HAND? YES 1 NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME THRUST QUICK STARTING FLUID NSN \_\_\_\_\_  
RADIATOR SPECIALTY COMPANY

MANUFACTURER NAME CHARLOTTE, NC. 28234

FORM: LIQUID SOLID GAS OTHER SPRAY USE \_\_\_\_\_

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS 1 / \* .31 GAL 1 / \* CUF 1 / \*

MSDS ON HAND? YES 1 NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_

WORK AREA(ROOM) LOCK UP ROOM CODE \_\_\_\_\_

PRODUCT NAME GENERAL PURPOSE DETERGENT NSN 7930-00-926-7386

MANUFACTURER NAME LIGHTHOUSE FOR THE BLIND

FORM: LIQUID  SOLID  GAS  OTHER  USE CLEANER

USER LABORER CODE \_\_\_\_\_

QUANTITIES: LBS 1.1 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*  
PINE OIL\*\*\*\*\*

PRODUCT NAME DISINFECTANT DETERGENT NSN 6840-00-687-7904

MANUFACTURER NAME LIGHTHOUSE FOR THE BLIND

FORM: LIQUID  SOLID  GAS  OTHER  USE

USER LABORER CODE \_\_\_\_\_

QUANTITIES: LBS .26 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*  
NOW\*\*\*\*\*

PRODUCT NAME VANDALISM MARK REMOVER NSN  
NOW CHEMICAL CORPORATION

MANUFACTURER NAME HOLLISTON, MA. 01746

FORM: LIQUID  SOLID  GAS  OTHER SPRAY USE

USER \_\_\_\_\_ CODE \_\_\_\_\_

QUANTITIES: LBS 4.0 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_

WORK AREA(ROOM) LOCK UP room CODE \_\_\_\_\_

PRODUCT NAME AIR FRESHENER NSN \_\_\_\_\_  
HYSAN CORP.

MANUFACTURER NAME DES PLAINES IL 60018

FORM: LIQUID SOLID GAS OTHER SPRAY USE

USER LABORER

QUANTITIES: LBS 1\*.86 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME GLASS CLEANER NSN 7980-00-664-6910  
LIGHTHOUSE FOR THE BLIND

MANUFACTURER NAME HOUSTON, TX 77019

FORM: LIQUID X SOLID GAS OTHER USE

USER \_\_\_\_\_ CODE \_\_\_\_\_

QUANTITIES: LBS 1\*.62 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME WINDSHIELD CLEANING COMPOUND NSN \_\_\_\_\_  
MIDWEST POLY CHEM, LTD

MANUFACTURER NAME MELROSE PARK IL 60160

FORM: LIQUID X SOLID GAS OTHER USE

USER Anyone CODE \_\_\_\_\_

QUANTITIES: LBS 1\*.06 GAL 1\* CUF 1\*

MSDS ON HAND? YES NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY OFFICE CODE \_\_\_\_\_

WORK AREA (ROOM) LOCK UP Room CODE \_\_\_\_\_

PRODUCT NAME GERMICIDAL SPRAY & CLEANER NSN  
BRULIN & CO. INC.

MANUFACTURER NAME WESTWOOD, NJ 07675

FORM: LIQUID    SOLID    GAS    OTHER SPRAY USE

USER LABORER

QUANTITIES: LBS 6 1/2 /\* GAL 1 /\* CUF 1 /\* TOILET CLEANER

MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*  
PRODUCT NAME AIR FRESHENER NSN  
FULD-STALFORT INC.

MANUFACTURER NAME HAURE de GRACE, MD 21078

FORM: LIQUID X SOLID    GAS    OTHER SPRAY USE

USER LABORER CODE \_\_\_\_\_

QUANTITIES: LBS    /\* .06 GAL 1 /\* CUF    /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*  
PRODUCT NAME ELMER'S GLUE NSN  
BORDEN INC.

MANUFACTURER NAME DEPT. CP COLUMBUS OHIO 43215

FORM: LIQUID X SOLID    GAS    OTHER    USE

USER \_\_\_\_\_ CODE \_\_\_\_\_

QUANTITIES: LBS    /\* .06 GAL 1 /\* CUF    /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91

BUILDING NAME UTILITY BLDG CODE \_\_\_\_\_

WORK AREA(ROOM) LOCK UP room CODE \_\_\_\_\_

PRODUCT NAME INSECT REPELLENT NSN \_\_\_\_\_  
STAR MARK

MANUFACTURER NAME CLEARWATER, FL 34621-0260

FORM: LIQUID  SOLID  GAS  OTHER  USE INSECT REPELLENT

USER ANYONE

QUANTITIES: LBS /\* .15 GAL /\* CUF /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*  
HALT

PRODUCT NAME INSECT REPELLENT NSN \_\_\_\_\_  
MAINTENANCE CHEMICAL CO.

MANUFACTURER NAME MESSINA DR. BRAINTREE, MASS. 02184

FORM: LIQUID  SOLID  GAS  OTHER SPRAY USE

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS /\* .10 GAL /\* CUF /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*

PRODUCT NAME Dog REPELLENT NSN \_\_\_\_\_  
ANIMAL'S REPELLENT INC.

MANUFACTURER NAME GRIFFIN GEORGIA 30223

FORM: LIQUID  SOLID  GAS  OTHER SPRAY USE To REPELL Dogs

USER ANYONE CODE \_\_\_\_\_

QUANTITIES: LBS /\* .X GAL /\* CUF /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP Room CODE \_\_\_\_\_PRODUCT NAME DERMI-KLENE NSN \_\_\_\_\_  
DERMI-KLENE CO.MANUFACTURER NAME FULLERTOWN, CA 92631 \_\_\_\_\_FORM: LIQUID SOLID GAS OTHER CREAM USE HAND SOAPUSER ANYONE CODE \_\_\_\_\_QUANTITIES: LBS 3.0 /\* GAL /\* CUF /\*

MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*

PRODUCT NAME HAND CLEANER NSN \_\_\_\_\_  
MAKOR PRODUCTS MANUFACTURING CO.MANUFACTURER NAME RIVERHEAD, NY 11901 \_\_\_\_\_FORM: LIQUID SOLID GAS OTHER CREAM USE HAND CLEANERUSER ANYONE CODE \_\_\_\_\_QUANTITIES: LBS 2.0 /\* GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*

PRODUCT NAME INSECT REPELLENT NSN 6840-00-753-4963  
AIRASOL COMPANY, INC.MANUFACTURER NAME NEODESHA, KANSAS 66757 \_\_\_\_\_FORM: LIQUID X SOLID GAS OTHER USE INSECT REPELLENTUSER ANYONE CODE \_\_\_\_\_QUANTITIES: LBS /\* 1 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP room CODE \_\_\_\_\_  
MCSPRODUCT NAME INVISIBLE PESTICIDE NSN \_\_\_\_\_  
MANUFACTURER NAME MAINTENANCE CHEMICAL SUPPLY  
101 MESSINA DRIVEBRAINTREE, MASS. 02184FORM: LIQUID  SOLID  GAS  OTHER  USE PESTICIDEUSER LABORERQUANTITIES: LBS /\* .43 GAL /\* CUF /\*MSDS ON HAND? YES  NO \* LAST INVENTORY\*\*\*\*\*  
PRODUCT NAME INSECT SPRAY NSN \_\_\_\_\_  
MANUFACTURER NAME THE SUPPLY COMPANY, INC.  
P.O. BOX E 223DEDHAM, MA. 02026-0904FORM: LIQUID  SOLID  GAS  OTHER SPRAY USE INSECT SPRAYUSER ANYONE CODE \_\_\_\_\_QUANTITIES: LBS /\* .10 GAL /\* CUF /\*MSDS ON HAND? YES  NO \* LAST INVENTORY\*\*\*\*\*  
PRODUCT NAME D-TRANS NSN 6840-01-067-2137MANUFACTURER NAME BULK CHEMICALS DISTRIBUTORS, INC.  
NO. 1 INDUSTRIAL LANEGRETNNA, LA. 70053FORM: LIQUID  SOLID  GAS  OTHER SPRAY USE INSECTICIDEUSER ANYONE CODE \_\_\_\_\_QUANTITIES: LBS /\* .77 GAL /\* CUF /\*MSDS ON HAND? YES  NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BLDG. CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP Room CODE \_\_\_\_\_PRODUCT NAME TOILET DEODERANT CAKE NSN 684-00-246-6438

MANUFACTURER NAME \_\_\_\_\_

FORM: LIQUID SOLID X GAS OTHER USE URINAL DEODERANTUSER LABORER \_\_\_\_\_QUANTITIES: LBS 2.0 /\* GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY\*\*\*\*\*  
TOILET DEODERANT  
\*\*\*\*\*PRODUCT NAME TYPE 2 CAKE NSN 6840-00-664-6610

MANUFACTURER NAME \_\_\_\_\_

FORM: LIQUID SOLID X GAS OTHER USE URINAL DEODERANTUSER LABORER CODE \_\_\_\_\_QUANTITIES: LBS 1.0 /\* GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY\*\*\*\*\*  
AD 103  
\*\*\*\*\*PRODUCT NAME DEODORIZING INSECT SPRAY NSNMANUFACTURER NAME P.O. BOX 6099 NEW ORLEANS, LOUISIANA 70147FORM: LIQUID X SOLID GAS OTHER SPRAY USE INSECT SPRAYUSER LABORER CODE \_\_\_\_\_QUANTITIES: LBS /\* .125 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BLDG CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP Room CODE \_\_\_\_\_PRODUCT NAME GREAT HAND CLEANER NSN \_\_\_\_\_MANUFACTURER NAME CLEVELAND COTTON PRODUCTSFORM: LIQUID  SOLID  GAS  OTHER  USE HAND CLEANERUSER ANYONE AT PROJECTQUANTITIES: LBS /\* 3.0 GAL /\* CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*

PRODUCT NAME PREEN WAX NSN 3160051400  
THE KIW POLISH CO.MANUFACTURER NAME POTTSTOWN, PENN. 19464FORM: LIQUID  SOLID  GAS  OTHER  USE FLOOR WAXUSER LABORER CODE \_\_\_\_\_QUANTITIES: LBS /\* GAL 1.0 CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

\*\*\*\*\*

PRODUCT NAME GENERAL PURPOSE DETERGENT NSN 7930-00-177-5243MANUFACTURER NAME LIGHTHOUSE FOR THE BLINDFORM: LIQUID  SOLID  GAS  OTHER  USE CLEANINGUSER LABORER CODE \_\_\_\_\_QUANTITIES: LBS /\* GAL 3.0 CUF /\*MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

## HAZARDOUS MATERIALS INVENTORY SHEET

DATE 12/17/91BUILDING NAME UTILITY BUILDING CODE \_\_\_\_\_WORK AREA(ROOM) LOCK UP ROOM CODE \_\_\_\_\_PRODUCT NAME DETERGENT (WATER SOLUBLE) NSN \_\_\_\_\_  
OCTAGON PROCESS, INC.MANUFACTURER NAME EDGEWATER, NJ.FORM: LIQUID  SOLID \_\_\_\_\_ GAS \_\_\_\_\_ OTHER \_\_\_\_\_ USE CLEANING, WASHING  
USER LABORERQUANTITIES: LBS 1\* GAL .5 CUF 1\*MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*PRODUCT NAME SOAP BORAX (POWDERED) NSN 0520-00-270-0068  
CONCORD CHEMICAL CO., INC.MANUFACTURER NAME CAMDEN, NJ. 08105FORM: LIQUID \_\_\_\_\_ SOLID \_\_\_\_\_ GAS \_\_\_\_\_ OTHER <sup>POWDER</sup> USE CLEANING  
USER LABORER CODE \_\_\_\_\_QUANTITIES: LBS 2.0 GAL 1\* CUF 1\*MSDS ON HAND? YES / NO \* LAST INVENTORY  
\*\*\*\*\*PRODUCT NAME WINDOW CLEANER NSN \_\_\_\_\_  
FEDERATED FOODSMANUFACTURER NAME PARK RIDGE ILL 60068FORM: LIQUID  SOLID \_\_\_\_\_ GAS \_\_\_\_\_ OTHER \_\_\_\_\_ USE WINDOW CLEANER  
USER LABORER CODE \_\_\_\_\_QUANTITIES: LBS 1\* GAL .125 CUF 1\*MSDS ON HAND? YES / NO \* LAST INVENTORY

- Include office supplies i.e. toners, whiteout, etc.

Project: Tolu 16

Paint Locker & Hazardous Waste Burners

Name of Product	Use	Composition	Section 4 Hazard	Quantity on Hand	Product 21/11 Used / yr	Quantity Used / yr	Quantity Discarded / yr
				Usable	Yes/No		
Zope and Lacquer Thin	Lacquer Thinner	Cellophane-Nitro	Toxic Flammable	13 gal	Yes	6 gal	6 gal
Trichloroethane	Clean Signs	Unknown	" "	5 gal	Yes	5 gal	0 gal
Enamel Thinner	Thin Enamel	TT-T30EC TPZ	" "	11 gal	Yes	5 gal	2 gal
Enamel Reducer	Spraying Enamel	Unknown	" "	2 gal	Yes	1 gal	0 gal
Turpentine	Making Stain	Unknown	" "	22 gal	Yes	10 gal	5 gal
Insul-X	Unknown	Unknown	Unknown	2 qt	Yes	0	0
Gear Oil	Bear Lube	Unknown	UTQX10	4 gal	Yes	1 gal	25 gal
Paint Oil Base	Misc.	Unknown	Toxic Flammable	87 gal	Yes	0	0
Paint Latex Base	Misc.	Unknown	Toxic	20 gal	Yes	15 gal	0
Aerosol Cans Paint	Misc.	Unknown	Toxic Flammable	1/8 ea.	Yes	75 ea	0
Aerosol Cans Chemicals	Misc.	Unknown	Toxic Flammable	33 ea.	Yes	70 ea	0
Anti Freeze	Freeze Protection	Un Known	Toxic	1/6 gal	Yes	9 gal	9 gal
Gasoline	Fuel	Unknown	Toxic Flammable	25 gal	Yes	200 gal	0 gal
Windshield Fluid	Freeze Protection	Unknown	Toxic Flammable	13 gal	Yes	8 gal	0
Motor Oil	Lubrication	Un Known	Toxic	8 gal	Yes	13 gal	10 gal
Transmission Fluid	Lubrication	Un Known	Toxic	25 gal	Yes	2 gal	0
Boundary Paint	Mark Boundaries	Un Known	Toxic Flammable	25 gal	Yes	8 gal	0
ILK Screen Paint	Sign Making	Un Known	Toxic Flammable	7 gal	Yes	2 qts	0
ILK Screen Chemicals	Sign Making	Un Known	Toxic Flammable	40 gal	Yes	10 gal	5 gal
Diesel Fuel	Tractor Fuel	Un Known	Toxic Flammable	38 gal	Yes	150 gal	0
W/Silicone Remover	Clean Signs	Un Known	Toxic Flammable	1 gal	Yes	~ 12 gal	0